

ENFORCEMENT ON NONCOMPLIANT DOT-407 TYTAL CARGO TANK MOTOR VEHICLES: Issued by FMCSA Office of Enforcement; July 6, 2016

Issued To: MC-F; Motor Carrier Safety Assistance Program (MCSAP) State Partners

On May 11, 2016, the Federal Motor Carrier Safety Administration (FMCSA) issued a safety advisory notice to owners and operators of cargo tank motor vehicles (CTMVs) with a capacity of 8,400, 8,717 and 10,500 gallons manufactured by Trailers Y Tanques de Aluminio (TYTAL) (https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/TYTAL%20Safety%20Advisory_with%20CT%20List.pdf). The CTMVs were not manufactured in compliance with the Federal Hazardous Materials Regulations (HMRs).

TYTAL Cargo Tanks Impacted By Notice

TYTAL CTMVs with **capacities of 8,400 and 8,717 gallons** have been found to NOT have the rollover accident damage protection required by 49 CFR 178.345-8(c)(1). Attached to this notice is comprehensive list of the TYTAL CTMVs that are subject to the safety advisory notice.

TYTAL CTMVs with a **capacity of 10,500 gallons** have been found to NOT have:

- Venting capacity of pressure relief systems required by 49 CFR 178.345-10(e); and
- Rollover accident damage protection required by 49 CFR 178.345-8(c)(1).

Effective June 1, 2016, these tanks should have been removed from Hazardous Materials service until repairs were made. Figure 1, below highlights the area of concern regarding rollover accident damage protection and the location for changes made to the venting for the TYTAL CTMVs with capacities of 10,500 gallons.



Figure 1

The following are examples of the before and after repairs of these CTMVs.

Figures 2 and 3 are an example of rollover damage protection repairs that **MUST** be conducted on **ALL** TYTAL CTMVs. The manufacturer has suggested that additional framing be installed over the original box frame, as depicted in the following pictures.



Figure 2

Before Repair: Note design of box frame from factory. No overlay is present.



Figure 3

After Repair : Additional framing attached over original box frame to provide additional strength.

Figure 4 is a photo of the original venting on a TYTAL 10,500 gallon tank that was found to be inadequate. To correct this violation, a second pressure relief device (PRD) must be installed as shown in Figure 5.

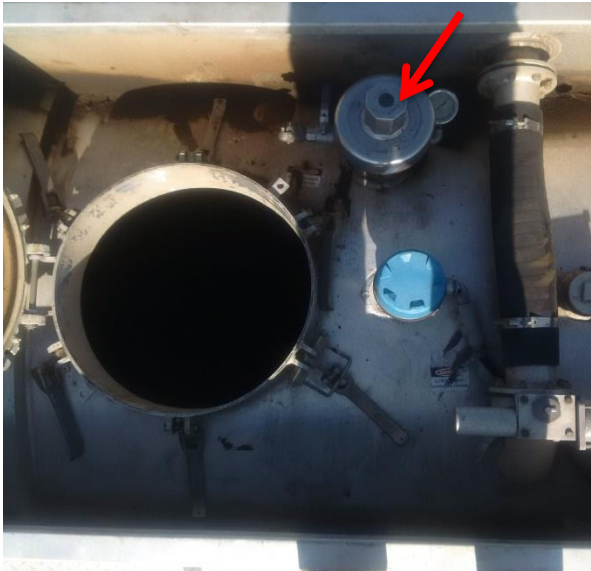


Figure 4

Before Repair: Single PRD



Figure 5

After Repair: Dual PRDs

Enforcement Guidance

If, during the course of a roadside inspection, it is determined that the CTMV is transporting hazardous materials requiring a specification cargo tank, and the necessary repairs were **NOT** made, the following actions are recommended:

- a) For missing Pressure Relief Devices (PRD), cite 49 CFR 178.345-10 and place the TYTAL CTMV out-of-service per the *North American Standard Out-of-Service Criteria* (OOSC), Part III, Item 3.d.

- b) For improper overturn protection, cite the vehicle as being an unauthorized package. A second violation of 49 CFR 178.345-8(c) should be noted and the vehicle placed out-of-service per the OOSC Part III, Item 3.c. While FMCSA understands that this is generally considered to be a “specification shortage,” TYTAL and the vehicle operators have been previously notified of the defects and that the cargo tank was required to be taken out of hazardous materials transportation service until the proper repairs were made.

Special Study Entries

In addition, and regardless of the commodity transported, FMCSA has set aside Special Study Fields #1 and #2 in Aspen to record the results of TYTAL cargo tank inspections. Beginning on or about July 6, 2016, and ending on June 30, 2017, the following information should be entered:

- a) Special Study Field #1: **TYTAL 407 RPD**. This entry is to be used to identify cargo tanks inspected under this advisory that have been **repaired**.
- b) Special Study Field #2: **TYTAL 407 NRPD**. This entry is to be used to identify cargo tanks inspected under this advisory that were **not repaired**.

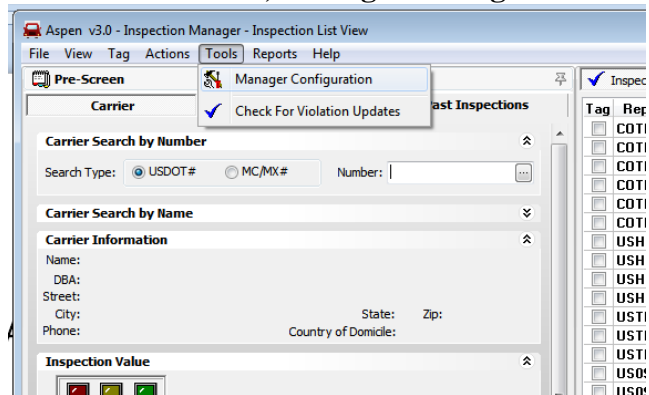
List of TYTAL Tanks Under this Advisory

Attached to this notice is the appendix to the safety advisory notice that FMCSA issued on May 11, 2016. This attachment includes a comprehensive list of TYTAL CTMVs that FMCSA found to be non-compliant and subject to this advisory.

Adding TYTAL to List of Manufacturers in Aspen

In order to add TYTAL to your list of vehicle manufacturers’ codes in Aspen, the following instructions are offered:

1. Select Tools, Manager Configuration



Enter the manager password. Contact your Aspen administrator for the password.

2. Select Table Editor

The Aspen Configuration dialog box has several tabs: General, Options, Upload, Backup, External, Barcode, and Import. The 'Report Number' section contains the following fields and buttons:

- Starting/Next Number: USTEST000017
- State Abbreviation: US
- Computer Code: TEST
- Report Number: 000017
- Buttons: Change Password..., Table Editor..., Data Location..., Printed Report...
- Bottom buttons: OK, Cancel, Help

The 'Table Editor...' button is circled in red.

3. Select Vehicle Make List

The Table Editor dialog box shows a list of tabs: Inspection Sites, Inspector List, State Violation List, Cargo/OOS Until Lists, Vehicle Make List (circled in red), and Custom State List. Below the tabs is a table with the following data:

Country	State	Inspection Location	County Name	FIPS Code
US	NM	Columbus, NM Port of Entry	LUNA	029
US	TX	Pharr, TX Port of Entry	HIDALGO	215
US	NM	Santa Teresa, NM Port of Entry	DONA ANA	013

At the bottom of the dialog are buttons for Add, Del, Edit, and navigation arrows.

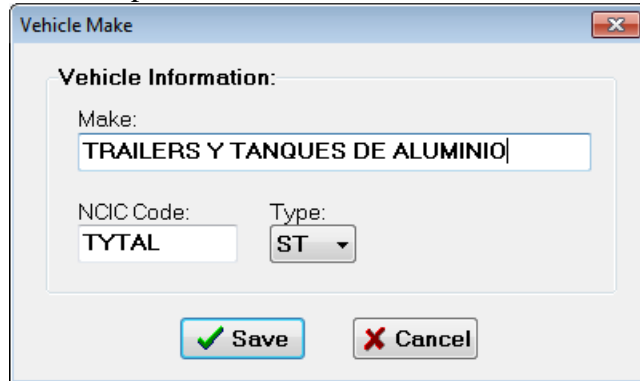
4. Click the Add button

The Table Editor dialog box shows the 'Vehicle Make List' tab selected. The table below contains a list of vehicle makes with their corresponding NCIC Codes and Types:

Vehicle Make	NCIC Code	Type
A-1 TRAILER	AONE	ST
A-A WELDING SERVICE	AAWS	ST
A & B TRAILER MFG. CO., INC.	ABTR	ST
A & C KNIGHT, LTD.	ACKN	ST
A & J INDUSTRIES CUSTOM	AJIN	ST
A & M BOAT TRAILER	AM	ST
A & M COACH	AMCO	ST
A. J. TRAVELUTE TRAILER MFG.	AJTR	ST
A.A.S. CO., INC.	AAB	ST
AAA MOBILE HOME MFG. CO.	AAA	ST
AALITE CO.	AALI	ST
AARDVARK CO.	AARD	ST
ABBOT, PAUL CO., INC.	ABBO	ST
ABC (ALUMINUM BODY CORP.)	ABC	ST

The 'Add' button at the bottom is circled in red.

5. Input the values as shown.



Vehicle Make

Vehicle Information:

Make:
TRAILERS Y TANQUES DE ALUMINIO

NCIC Code: TYTAL Type: ST

Save Cancel

6. Click **Save**

This vehicle manufacturer code is now available for use.

Contact Information

For additional information, please contact Paul Bomgardner, Chief of the Hazardous Materials Division at (202)493-0027, or by e-mail at paul.bomgardner@dot.gov; or James Simmons, Hazardous Materials Program Manager, FMCSA Western Service Center at (404)474-5208, or by e-mail at james.simmons@dot.gov.

**TYTAL 10,500 GALLON CARGO TANK MOTOR
VEHICLES REQUIRED TO BE REPAIRED FOR ACCIDENT
ROLLOVER PROTECTION AND VENTING CAPACITY
BEFORE JUNE 1, 2016**

<u>DATE OF MANUFACTURE</u>	<u>MANUFACTURER SERIAL NUMBER</u>
2/7/2012	3T1L1TA34CC000172
2/7/2012	3T1L1TA36CC000173
2/13/2012	3T1L1TA30CC000234
2/15/2012	3T1L1TA37CC000196
2/17/2012	3T1L1TA30CC000198
2/17/2012	3T1L1TA39CC000197
2/20/2012	3T1L1TA32CC000199
2/21/2012	3T1L1TA35CC000200
2/21/2012	3T1L1TA37CC000201
2/23/2012	3T1L1TA39CC000202
2/24/2012	3T1L1TA30CC000203
2/24/2012	3T1L1 TA32CC000204
2/24/2012	3T1L1TA34CC000205
2/25/2012	3T1L1 TA37CC000294
2/25/2012	3T1L1TA39CC000295
2/27/2012	3T1L1TA30CC000296
2/28/2012	3T1L1TA36CC000299
2/29/2012	3T1L1TA30CC000301
2/29/2012	3T1L1TA32CC000297
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3/2/2012	3T1L 1TA38CC000370
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3/6/2012	3T1L1TA31CC000226
3/6/2012	3T1L1TA31CC000372
3/6/2012	3T1L1TA32CC000218
3/6/2012	3T1L1TA32CC000221
3/6/2012	3T1L 1TA33CC000227
3/6/2012	3T1L 1TA34CC000219
3/6/2012	3T1L 1TA34CC000222
3/6/2012	3T1L 1TA36CC000223
3/6/2012	3T1L1TA38CC000224
3/6/2012	3T1L1TA3XCC000225
3/6/2012	3T1L1TA3XCC000371
3/23/2012	3T1L1TA3XCC000208
3/26/2012	3T1L1TA31CC000209
3/26/2012	3T1L 1TA31CC000212
3/26/2012	3T1L 1TA38CC000210
3/26/2012	3T1L1TA3XCC000211
3/28/2012	3T1L1TA33CC000230
3/28/2012	3T1L 1TA35CC000228
3/28/2012	3T1L1TA35CC000231
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4/9/2012	3T1L 1TA39CC000393
4/11/2012	3T1L1TA32CC000395
4/11/2012	3T1L1 TA34CC000396

4/11/2012	3T1L1TA36CC000304
4/11/2012	3T1L1TA36CC000397
4/11/2012	3T1L1TA38CC000305
4/12/2012	3T1L 1TA35CC000214
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4/15/2012	3T1L1TA39CC000216
4/16/2012	3T1L1TA3XCC000452
4/17/2012	3T1L1TA31CCQ00307
4/17/2012	3T1L1TA31CC000310
4/17/2012	3T1L1TA33CC000308
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4/19/2012	3T1L1TA31CC000324
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5/17/2012	3T1L1TA3XCC000340
5/22/2012	3T1L1TA35CC000570
5/24/2012	3T1Lfr A38CC000580
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6/14/2012	3T1L1TA31CC000419
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6/14/2012	3T1L1TA3XCC000418
6/18/2012	3T1L1TA33CC000356
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8/7/2012	3T1L1T A38CC000711
8/7/2012	3T1L1TA3XCC000709
8/9/2012	3T1L1TA34DC000027

**TYTAL'S 8,400 and 8,717 GALLON CARGO TANK MOTOR
VEHICLES REQUIRED TO BE REPAIRED FOR ACCIDENT
ROLLOVER PROTECTION BEFORE JUNE 1, 2016**

<u>DATE OF MANUFACTURE</u>	<u>MANUFACTURER SERIAL NUMBER</u>
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10/12/2011	3T1L1T622BC000072
10/27/2011	3T1L1T62XBC000059
10/27/2011	3T1L1T625BC000082
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11/17/2011	3T1L1T624CC000012
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11/28/2011	3T1L1T628CC000014
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7/18/2012	3T1L1T62XCC000614
7/26/2012	3T1L1T620CC000718
7/26/2012	3T1L1T621CC000713
7/26/2012	3T1L1T622CC000719
7/26/2012	3T1L1T623CC000714
7/26/2012	3T1L1T625CC000715
7/26/2012	3T1L1T627CC000716
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7/26/2012	3T1L1T62XCC000712
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8/9/2012	3T1L1T622DC000026
8/9/2012	3T1L1T623DC000004
8/9/2012	3T1L1T628DC000001
8/9/2012	3T1L1T62XDC000002
8/22/2012	3T1L1T624CC000687
8/22/2012	3T1L1T625DC000005
8/22/2012	3T1L1T626CC000688
8/22/2012	3T1L1T628CC000689
8/23/2012	3T1L1T624CC000690
8/23/2012	3T1L1T626CC000691
8/23/2012	3T1L1T628CC000692
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9/13/2012	3T1L1T620DC000090
9/13/2012	3T1L1T622DC000088

9/13/2012	3T1L1T624DC000089
9/13/2012	3T1L1T629DC000086
10/4/2012	3T1L1T620CC000704
10/4/2012	3T1L1T624CC000706
10/6/2012	3T1L1T625CC000696
10/8/2012	3T1L1T623CC000695
10/8/2012	3T1L1T629CC000698
10/9/2012	3T1L1T623CC000700
10/10/2012	3T1L1T620CC000699
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10/24/2012	3T1L1T622CC000705
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11/6/2012	3T1L1T625DC000103
12/4/2012	3T1L1T622DC000138
12/5/2012	3T1L1 T624DC000139
12/28/2012	3T1L1T620DC000154
12/28/2012	3T1L1T629DC000153
1/15/2013	3T1L1T621DC000146
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1/15/2013	3T1L1T625DC000148
1/15/2013	3T1L1T627DC000149
2/13/2013	3T1L1T626DC000157
2/13/2013	3T1L1T628DC000158
2/13/2013	3T1L1T62XDC000159
2/21/2013	3T1L1T626DC000160
2/21/2013	3T1L1T628DC000161
2/22/2013	3T1L1T62XDC000162
2/28/2013	3T1L1T621DC000163
3/6/2013	3T1L1T620DC000168
3/6/2013	3T1L1T622DC000169
3/6/2013	3T1L1T623DC000164
3/6/2013	3T1L1T625DC000165
3/6/2013	3T1L1 T627DC000166
3/6/2013	3T1L1T629DC000167
3/6/2013	3T1L1T629DC000170
3/7/2013	3T1L1T620DC000171
3/7/2013	3T1L1T622DC000172
3/8/2013	3T1L1T627DC000233
3/8/2013	3T1L1T624DC000173
3/14/2013	3T1L1T626DC000174
3/14/2013	3T1L1T628DC000175
3/14/2013	3T1L1T62XDC000176
3/15/2013	3T1L1T621DC000194
3/15/2013	3T1L1T623DC000195
3/15/2013	3T1L1T625DC000196
3/19/2013	3T1L1T620DC000199
3/19/2013	3T1L1T623DC000200
3/19/2013	3T1L1T625DC000201
3/19/2013	3T1L1T627DC000197
3/19/2013	3T1L1T627DC000202
3/19/2013	3T1L1T629DC000198

3/21/2013
3/25/2013

3T1L1 T62XDC000288
3T1L1T62XDC000193

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4/1/2013
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