



U.S. Department
of Transportation

**Federal Motor Carrier
Safety Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

Refer to: MC-ECH

NOTICE REGARDING TRINITY MANUFACTURED MC 331 CARGO TANKS

This notice is to inform you of the U.S. Department of Transportation (DOT) Special Permit (SP) 14689, issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA), to Trinity Industries. The SP allows the continued use in transportation of DOT specification MC 331 cargo tanks manufactured by Trinity Industries between 1996 and 2006, provided that the cargo tanks are maintained in compliance with the specific requirements of this SP.

Based on SP 14689, the cargo tanks are exempt from the following Hazardous Material Regulations.

1. 49 CFR 178.337-3 (g) requiring the use of pads when mounting baffle clips to the shell of the cargo tanks.
2. Marking requirements found in 49 CFR 172.203 (a) and 49 CFR 172.302 (c).

Cargo tank facilities that inspect, test, or repair Trinity Industries MC 331 cargo tanks manufactured between 1996 and 2006 must maintain a current copy of SP 14689 at each repair facility where the cargo tank motor vehicle is tested or repaired, and follow the procedures established by SP 14689.

The following is a partial list of the actions that must be taken when maintaining Trinity Industries MC 331 cargo tanks manufactured between 1996 and 2006 in accordance with this special provision:

- A comprehensive inspection must be completed with the removal of all baffle clips for evaluation;
- Pressure testing according to 49 CFR 180.407 (g) is required. The required internal inspection must include a detailed inspection of appurtenances (baffles, bolting, clips, pads, piping or other internals), their attachment to the cargo tank wall, and the interior wall of the cargo tank;
- Baffles that cannot be inspected as installed shall be detached or removed for inspection and evaluation;
- The area of direct weld attachment to the shell of the baffles, or clips, must be inspected for cracking, corrosion, weld defects or other defects that may cause the baffles or clips to detach from the shell. Non-ferrous baffles or clips must be examined by the Liquid Penetrant method; ferrous baffles or clips must be examined by the wet Fluorescent Magnetic Particle method;
- Any cracked or corroded clips must be replaced with materials with properties that are equivalent to that of the cargo tank wall, or a material approved by a Design Certifying Engineer (DCE);

- Any damaged, cracked or corroded baffles attached directly to the shell must be repaired, or replaced;
- Clip supported baffles must be inspected for cracking, corrosion, weld defects, or any part of the baffle that has become detached from any of its anchor points. Particular attention must be given to bolt holes that are enlarged from the original shape or size. Bolting that is worn must be replaced; and
- Any changes made outside of the original design to repair or replace these attachments have to be approved by a DCE.

The complete list of requirements for maintaining Trinity Industries MC 331 cargo tanks manufactured between 1996 and 2006 can be viewed and downloaded from the PHMSA Web site at <http://www.phmsa.dot.gov/hazmat/regs/sp-a/special-permits/search> by typing in the SP number 14689. Please forward copies of the SP to all of your testing, inspection and repair facility locations. If there are any questions, please contact the Federal Motor Carrier Safety Administration's Hazardous Materials Division at (202) 385-2400.

Sincerely,

A handwritten signature in black ink that reads "Joseph P. DeLorenzo". The signature is written in a cursive, flowing style.

Joseph P. DeLorenzo
Director, Office of Enforcement and Compliance