



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

JUN 03 2016

Mark Mietz
Patriot Tank Lines Inc.
2737 Erie Drive
Weedsport, NY 13166

Ref. No. 16-0001

Dear Mr. Mietz:

This responds to your December 22, 2015 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to marking inlets and outlets on DOT Specification MC331 cargo tanks. Specifically, you ask whether the marking provided in § 178.337-9(c) is required on the inlet and outlet equipment or on the cargo tank wall. You also ask whether there is a size requirement for the marking and whether it needs to be stamped or embossed.

In accordance with § 178.337-9(c), except for gauging devices, thermometer wells, and pressure relief valves, each cargo tank inlet and outlet on a DOT Specification MC331 cargo tank must be marked "liquid" or "vapor" to designate whether it communicates with liquid or vapor when the cargo tank is filled to the maximum filling density. The required markings must be on the inlet and outlet equipment itself and in close proximity to its respective make/break connection point, rather than on the cargo tank wall. Furthermore, there is no minimum size requirement and no requirement for the markings to be stamped or embossed. However, we recommend the marking be of a size and manner that is readily visible and durable such that it withstands the wear and tear of transport conditions.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Ciccarone
§178.337-9c
Packaging Specs
16-0001

Dodd, Alice (PHMSA)

From: Patrick, Eamonn CTR (PHMSA)
Sent: Tuesday, December 22, 2015 4:19 PM
To: Hazmat Interps
Subject: FW: 178.337-9c

Shante/Alice,
Please submit this for formal letter of interpretation.

Thanks,
Eamonn

-----Original Message-----

From: Mark Mietz [<mailto:mmetz@patriottank.com>]
Sent: Tuesday, December 22, 2015 1:53 PM
To: PHMSA HM InfoCenter
Subject: 178.337-9c

December 22, 2015

I'm requesting an interpretation on 178.337-9c as to the location of the markings of inlets and outlets. Is the marking required at the tank, and or at the furthest point from the tank, being the piping? Also is there a size requirement on the marking? Does it have to be stamped or embossed?

Thank you for your anticipated response.

Mark

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Mark Mietz
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