

# Transporting Skid Tanks: Mark Morgan (PMAA Weekly Review) Addresses Hazardous Materials Regulations Issues



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12/16/2019

Mark S. Morgan authored an article in the December 13th Petroleum Marketers Association of America ("PMAA") publication, *PMAA Weekly Review* titled:

*U.S. DOT hazardous Material Requirements for Transporting "Empty" Skid Tanks ("Article")*

Mr. Morgan serves as the Petroleum Marketers Association of America's Regulatory Counsel.

The *Article* addresses certain issues associated with the Pipeline and Hazardous Materials Safety Administration Hazardous Material Regulations ("HMR") addressing the transportation of "empty" skid tanks. PMAA is stated to have received a number of questions regarding the proper placarding requirements for empty skid tanks. The issue is complicated by questions that can arise if a skid tank is empty when it contains residues of fuels. Such questions must be addressed by the shipper or transporter.

The Petroleum Equipment Institute describes a skid tank as an aboveground tank mounted on a small, factory-built platform. The organization also notes that:

... at construction and farm sites, where fueling operations are performed on a temporary basis, it is desirable to have storage tanks available. Because of the temporary nature of the operation, however, it would be wasteful to install the tanks underground or mount them on permanent supports aboveground. In such instances, a tank will be mounted on a platform made of various steel structural shapes, such as angle iron or beams. The platform keeps the tank from resting directly on the ground and also prevents it from rolling over. Further, the platform allows the tank to be dragged from one location to another at the site, hence the term skid tank.

The PMAA *Article* notes several points regarding the transportation of skid tanks such as:

- Any petroleum bulk storage tank containing gasoline, diesel fuel, heating oil or kerosene or other hazardous material with a capacity greater than 119 gallons, is potentially subject to the United States Department of Transportation Hazardous Materials Regulation (therefore, it must be placarded for shipment and accompanied by a shipping paper).
- "Empty" is defined by the HMR as indicating a skid tank previously containing hazardous material is not considered empty until it has been cleaned of residue and purged of vapors.
- Transporting skid tanks without cleaning and purging means they must be placarded and accompanied by a HAZMAT shipping paper.

- The quantity on the shipping paper for a skid tank containing only residue which is typically designated in gallons or by truckload will be noted as residue.
- Residue is the substance remaining in a tank not suitable for powering an engine or equipment due to its impurities.

A copy of the *Article* can be downloaded [here](#).