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Transportation/Hazardous Materials: U.S. Pipeline and Hazardous Materials Safety Administration Addresses Question Regarding Marking Inlets/Outlets on Certain Cargo Tanks

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The United States Department of Transportation Pipeline and Hazardous Materials Safety Administration (“PHMSA”) responded to a letter from Patriot Tank Lines, Inc. requesting clarification of the Hazardous Materials Regulations (“HMR”) applicable to marking inlets and outlets on DOT Specification MC331 cargo tanks.

Patriot Tank Lines had asked whether:

1. The marking provided in § 178.337-9 (c) is required on the inlet and outlet equipment around the cargo tank wall.
2. Is there a size requirement for the marking and whether it needs to be stamped or embossed?

PHMSA responds in its June 3rd letter that except for gaging devices, thermometer wells, 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 federal agency also notes:

... 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 transfer conditions.

[A copy of the PHMSA letter can be downloaded here.](#)