



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

AUG 14 2017

Greg McRae
Consultant
Trinity Industries, LLC
2525 Stemmons Freeway
Dallas, TX 75207

Reference No. 17-0042

Dear Mr. McRae:

This letter is in response to your April 26, 2017, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to MC 331 cargo tanks. Specifically, you seek clarification of the requirements to provide heat treatment information on the Department of Transportation certificate of compliance when heat treatment is not required to be performed on an MC 331 cargo tank constructed of other than quenched and tempered (NQT) carbon steel.

In general, the certificate of compliance does not need to contain a statement whether or not a cargo tank was postweld heat treated. However, it is the opinion of this Office that postweld heat treatment can be permissively indicated on the certificate of compliance if the manufacturer chooses to disclose this information. According to § 178.337-1(f), postweld heat treatment must be as prescribed in the American Society of Mechanical Engineers (ASME) Code except that each cargo tank constructed in accordance with Part UHT of Section VIII of the ASME Code must be postweld heat treated. If an MC 331 cargo tank has been postweld heat treated, this information must be indicated on the name plate in accordance with the applicable requirements of the ASME Code.

Please note, there are different requirements for the certificate of compliance for cargo tanks used for anhydrous ammonia service (see § 178.337-18(a)(6)).

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

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

Baker
§ 178.337-18
Packaging Specs
17-0042



04.26.2017

e-mail: infocntr@dot.gov

Standards and Rulemaking Division
Pipeline and Hazardous Material safety Administration
East Building, 2 Floor
Washington D.C. 20590-0001

Attn: PPH-10
Request for Interpretation

Reference: CFR 178.337-18 D.O.T. Certification of Compliance

Please provide clarification as to information that is to appear on a manufactures Certificate of Compliance for MC-331 cargo tanks.

Background: MC-331 cargo tank manufactured of carbon steel, NQT material, and are not required to be heat treated by D.O.T. regulation or ASME code.

When heat treatment is required by ASME and DOT regulations the manufactures nameplate is stamped with the required marking and so noted on the manufactures U1-A data report.

Question: Is the manufacture required to also list functions that are not required to be performed such as heat treatment for the cargo tank described above that is not required to be heat treated?

Please contact me if you have any questions. I may be reached via phone at 214.589.8559 or email: greg.mcrae@trin.net

Best Regards,

A handwritten signature in black ink, appearing to read "Greg McRae", is written over a faint, larger version of the same signature.

Greg McRae
Consultant
Trinity Industries, LLC.