

400 Seventh St., S.W. Washington, D.C. 20590

JUN 2 0 2001

Mr. Don Lampshire Gas Service and Supply, Co. 3396 Swan Lake Road Bossier City, Louisiana 71111 Ref. No. 01-0154

Dear Mr. Lampshire:

This responds to your June 15, 2001 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to hoses on cargo tanks. Specifically, you ask if hose marking and periodic inspection and testing requirements apply to stainless steel flexible hoses on cargo tanks used to transport liquefied compressed gases.

The hose identification, inspection, and testing requirements for hoses on cargo tanks used to transport liquefied compressed gases are in § 180.416 of the HMR. These requirements apply to delivery hoses and hose assemblies only. A stainless steel hose used as a flexible connector in the piping system of a cargo tank is not a delivery hose. Thus, such stainless steel flexible connectors need not be marked with a unique identifier and are not subject to the periodic inspection, testing, and recordkeeping requirements applicable to delivery hose assemblies in § 180.416. Note, however, that stainless steel flexible connectors must be inspected and tested in accordance with requirements applicable to piping systems in § 180.416.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

John Gale

Senior Transportation Regulations Specialist Office of Hazardous Materials Standards

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Gorsky, Susan

From:

GSSPROVERS@acl.com

Sent:

Friday, June 15, 2001 4:49 PM

To:

susan.gorsky@rspa.dot.gov

Subject: Stainless Steel Flexible Hose

Dear Susan:

Please clarify the use of stainless steel flexible hoses in applications other than a delivery hose on MC-330, MC-331 & non-specification cargo tanks. Do the stainless steel hoses require testing, dates, and record retention of the information? Do these stainless steel hoses require an identification tag? An interpretation on this matter would be greatly appreciated.

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Sincerely, Don Lampshire Gas Service & Supply, Co. 3396 Swan Lake Road Bossier City, LA 71111 (318) 742-5881 Phone (318) 747-3425 Fax gssprovers@aol.com