



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

NOV 15 2001

Mr. Don Lampshire
Gas Service and Supply, Co.
3396 Swan Lake Road
Bossier City, Louisiana 71111

Ref. No. 01-0285

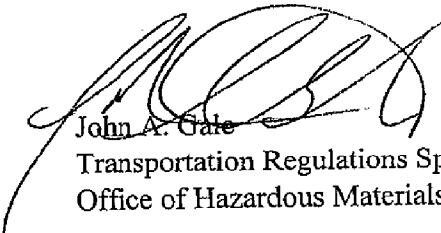
Dear Mr. Lampshire:

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 rubber 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 rubber hose used as a flexible connector in the piping system of a cargo tank is not a delivery hose. Thus, such rubber 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 rubber 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 A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



010285

180.416

Gas Service & Supply

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Johnsen
§ 180.416
Cargo Tanks
01-0285

October 29, 2001

Department of Transportation
Office of Hazardous Materials Safety
Attention: Stan Staniszewski

Dear Stan:

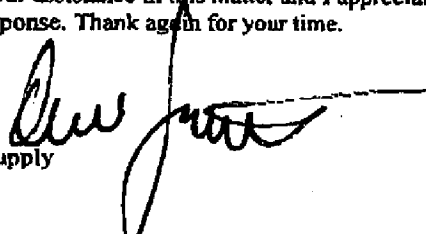
I am requesting clarification of Hazardous Materials Regulations (HMR: 49, Parts 171-180) applicable to rubber LP flexible connectors on cargo tanks.

Would a LPG rubber hose used as a flexible connector in a piping system on a MC331, MC330 or non-specification cargo tank be tested and inspected as part of the piping system? Are these rubber flexible hoses required to have serial numbers, dates, etc. as are delivery hoses? Are rubber LPG flexible connectors required to be changed out periodically as in a five year DOT complete test of the cargo tank?

Thank you for your assistance in this matter and I appreciate any information you can give me. You can fax or email your response. Thank again for your time.

Sincerely,

Don Lampshire
Gas Service & Supply



- Ref 01-0154 -

- rubber flexible -