



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

1200 New Jersey Avenue, SE
Washington, D.C. 20590

NOV 25 2014

Ing. Fernando Garza
Direccion Tecnica
Tytal
Cadereyta Jimenez, N.L.
Mexico

Ref. No. R13-0133

Dear Mr. Garza:

This is a follow up letter in response to your October 16, 2014 letter requesting further clarification of the Hazardous Materials Regulations (HMR; 49 CFR 171-180) applicable to U.S. Department of Transportation (DOT) Specification 407 cargo tank design criteria. Specifically, you ask whether your ring stiffener design meets the circumferential reinforcement regulations prescribed in 49 CFR 178.345-7(d). The pictures you provide of your design show a 1.5 inch gap in the ring stiffeners at the six o'clock position that will be used for drainage.

The answer to your question is yes. When a "ring stiffener" is also used as a circumferential reinforcement member, whether internal or external, the reinforcement must be *continuous* around the circumference of the cargo tank shell but the "ring stiffener" need not be continuous. Any reinforcement must also meet the general design requirements for structural integrity of specification DOT cargo tank motor vehicles prescribed in § 178-345-3.

This letter supersedes our previous response to your inquiry. As a result of further research into your inquiry, it was revealed that in a June 17, 1991 final rule, titled "Requirements for Cargo Tanks; Corrections" [56 FR 27873], the Research and Special Programs Administration (RSPA), the predecessor agency to the Pipeline and Hazardous Materials Safety Administration (PHMSA), clarified the requirements adopted in § 178.345-7(c). In its clarification, RSPA stated that in § 178.345-7(c), the word "it" is replaced with the word "reinforcement" to clarify that the circumferential reinforcement would be continuous, but the ring stiffener need not be continuous. This clarification clearly shows that it was not the Agency's intent at the time that the "ring stiffener" be continuous.

I trust this information is helpful. Please contact us if you require further assistance.

Sincerely,

Charles E. Betts
Director
Standards and Rulemaking Division