



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

APR - 6 2001

Mr. William Kalaskie  
Sherwood - Harsco Corporation  
2200 North Main Street  
Washington, PA 15301-6181

Ref. No. 01-0070

Dear Mr. Kalaskie:

This is in response to your March 7, 2001, letter and subsequent conversations with Michael Johnsen of my staff, regarding valves used in the transportation of phosgene under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). In particular, you ask about the requirements concerning valve housing requirements on cylinders and multi-unit tank car tanks transporting phosgene.

Your company wishes to manufacture a valve and valve housing for use on both cylinders and multi-unit tank car tanks transporting phosgene. Valve housing requirements for cylinders differ from valve housing requirements for tank cars. A valve on a cylinder used to transport phosgene is required to conform with § 173.40, which requires a gas-tight seal cap with a gasketed joint attached to the valve body of the cylinder. A valve housing on a multi-unit tank car tank transporting phosgene "must withstand tank test pressure and must be approved by the Associate Administrator for Hazardous Materials Safety" as specified in Special Provision B46 (§ 172.102).

A valve manufactured for use on both a cylinder and a multi-unit tank car tank transporting phosgene must meet both the descriptive requirements of § 173.40 and the performance standard of Special Provision B46. In addition, the valve must be approved by the Associate Administrator for Hazardous Materials Safety in accordance with Special Provision B46.

I hope this satisfies your request.

Sincerely,

John A. Gale  
Transportation Regulations Specialist  
Office of Hazardous Materials Standards



01-0070

173.314

Johnsen  
§173.314  
Multi Unit Tanks Car 

**Sherwood**

**Harsco**

**FAX TRANSMITTAL**

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TO: Mr. Edward Mazzullo  
OF: US DOT, Office of Hazardous Materials Standards  
FAX NUMBER: 202 366 3012  
FROM: William S. Kalaskie  
DATE: Wednesday, March 07, 2001  
PAGES (Including cover): 2  
SUBJECT: Phosgene Valves for Multi Unit Tanks (Class DOT 106A)

01-0070

This letter requests confirmation that 49 CFR requirements are being interpreted correctly in regards to the subject matter.

The regulations clearly specify in 173.40, which applies to phosgene in cylinders, that packed valves must be equipped with a gas tight, gasketed seal cap to prevent a loss of material through or past the packing.

Section 173.314, which applies to multi unit tanks for phosgene, does not specifically address the tank valves. However, 172.101 invokes Special Provision B46 which reads, "The detachable protective housing for the loading and unloading valves of multi-unit tank car tanks must withstand tank test pressure and must be approved by the Associate Administrator for Hazardous Materials Safety."

Consequently, if Special Provision B46 is being interpreted correctly, it would be acceptable to use the same type valve; i.e., without a gas tight seal cap, on a phosgene DOT 106A multi-unit tank as presently used on chlorine type DOT 106A tanks, to which the requirements of B46 do not apply. Additionally, it would also be acceptable to use valves in accordance with 173.40 with, or without, the pressure tight protective housings of B46.

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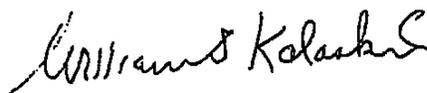
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One other matter that requires clarification is how to distinguish, by Tank Class designation, a DOT 106A tank with a pressure tight valve protective housing from a DOT 106A tank without a pressure tight protective housing.

Your assistance in the above matters would be greatly appreciated.

Sincerely yours,



William Kalaskie

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