



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

JUL 10 2002

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

Mr. Michael G. Merrill  
Director, Safety and Training Services  
Suburban Propane  
240 Route 10 West  
Whippany, NJ 07981-0206

Ref. No. 02-0163

Dear Mr. Merrill:

This is in response to your May 29, 2002 letter, requesting concurrence that the addition of your website address to your existing company logo on cargo tank motor vehicles, meets the intent of § 178.337-1(d) under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you state that the black letters of your website address would be located below your existing red stripe and on the lower half of the cargo tank as shown in the enclosed photograph. You indicate that the website address is approximately 0.33 square feet of the total 293 square foot surface area of the cargo tank.

As defined in § 178.337-1(d), every uninsulated cargo tank permanently attached to a cargo tank motor vehicle shall, unless covered with a jacket made of aluminum, stainless steel, or other bright non-tarnishing metal, be painted a white, aluminum or similar reflecting color on the upper two-thirds of area of the cargo tank.

It is the opinion of this Office that the addition of your website address to your existing company logo on the cargo tanks, as shown in the photograph you supplied, does not conflict with § 178.337-1(d); therefore, you appear to be in compliance with that section.

I hope this information is helpful. If we can be of further assistance, do not hesitate to contact us.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



02-0163

178.337-1(d)

**Suburban Propane**

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973 515 5986

Foster  
§ 178.337-1(d)  
Cargo Tanks  
02-0163

May 29, 2002

**Via Registered Mail P 349 792 833**  
**Return Receipt Requested**

Edward Mazullo, Director  
Hazardous Material Transportation  
DHM 10  
US Department of Transportation / RSPA  
400 7<sup>th</sup> Street S.W.  
Washington, DC 20590-0001

**RE: Addition to Company Logo on Cargo Tank Motor Vehicle**

Dear Mr. Mazullo:

Suburban Propane needs concurrence in writing that the addition of our website address to our existing Company Logo on Cargo Tank Motor Vehicles meets the intent of 178.337-1(d). Attached you will find a photograph of our intended addition to our Company logo. The black letters will be located below our existing red stripe and on the lower half of the cargo tank.

Section 178.337-1(d) identifies that a Cargo Tank is painted white, aluminum or similar reflecting color on the upper two-thirds of the area of the tank. DOT has traditionally allowed the owner's logo and placarding in that area. The additional area covered by the website address lettering is approximately 0.33 square feet of the total 293 square foot surface area of the Cargo Tank.

Suburban is intending to include the website address on approximately 1,200 Cargo Tank Motor Vehicles in our fleet throughout the United States. We request your concurrence prior to proceeding with this program.

Your expeditious review and response will be appreciated. I will be pleased to provide additional information as required.

Very truly yours,



Michael G. Merrill  
Director--Safety and Training Services

Attachment