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# Hazardous Materials/Transportation: U.S. Pipeline and Hazardous Materials Safety Administration Addresses Whether a Vinyl Decal is Considered a Lining or Coating

## Arkansas Environmental, Energy, and Water Law Blog

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The United States Pipeline and Hazardous Materials Safety Administration (“PHMSA”) asked for a clarification of the Hazardous Materials Regulations (“HMR”) applicable to the visual inspection of cargo tanks as it relates to vinyl wrapping.

PHMSA was responding to a November 6, 2015 question from Petroleum Fleet Specialists (“PFS”) asking whether a vinyl decal is considered a lining or coating as provided in 49 CFR § 180.407(d)(1).

The federal agency answered the query by stating:

A vinyl decal is not considered a lining or coating, but may restrict a proper external visual inspection from being performed. Section 180.407(c) requires all specification cargo tanks to have an external visual inspection at least once each year. As provided in § 180.407(d)(1), if external visual inspection is precluded because any part of the cargo tank wall is externally lined, coated, or designed to prevent an external visual inspection, those areas of the cargo tank must be internally inspected. Thus, if the outside of a cargo tank is covered with a vinyl decal that prevents the inspector from performing an external visual inspection (e.g., inspecting welds for cracks, shell for pitting, etc.), the cargo tank requires an internal visual inspection for the affected areas, in conjunction with an external visual inspection. However, if the decal still allows for an external visual inspection, an internal visual inspection would not be required.

[A copy of the PHMSA letter can be downloaded here.](#)