



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

APR 26 2016

Edwin Jackson
Petroleum Fleet Specialists
PO Box 1024
Marshal, VA 20116

Ref. No. 15-0221

Dear Mr. Jackson:

This responds to your November 6, 2015 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the visual inspection of cargo tanks as it relates to vinyl wrapping. Specifically, you ask whether a vinyl decal is considered a lining or coating as provided in § 180.407(d)(1).

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.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division