Roadway Striping/Use of Non-DOT Specification Cargo Tanks: Pipeline and Hazardous Materials Safety Administration Issues Safety Advisory Notice

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The Pipeline and Hazardous Materials Safety Administration ("PHMSA") issued an August 12th Safety Advisory Notice titled:

Roadway Striping and Use of Non-DOT Specification Cargo Tanks ("Safety Notice")

PHMSA states that the reason for issuing the Safety Notice is its belief there is a need to:

. . . inform the public, roadway striping stakeholders, and relevant government officials of the requirements for the use of non-DOT specification cargo tanks for roadway striping operations.

The Safety Notice notes that the federal Hazardous Materials Regulations ("HMR") "have always applied to the shipment and transportation of hazardous materials for roadway striping operations." Referenced are specific requirements for roadway striping vehicles using non-Department of Transportation ("DOT") specification cargo tanks.

These HMR requirements are noted to have gone into effect in 2011.

PHMSA expresses companies conducting these operations may not be aware of the previously referenced HMR requirements. Compliance inspections are stated to have identified instances in which road striping companies were not meeting such requirements.

The remainder of the Safety Notice describes the requirements found in 49 C.F.R. § 173.5a(c) that are applicable to non-DOT specification cargo tanks used for roadway striping operations. The requisites for allowing non-DOT specification cargo tanks for such purposes are identified, including certain testing requirements. The need to identify packagings (because a variety of types are utilized) and test accordingly are noted.

A copy of the Safety Notice can be downloaded here.