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CODES & STANDARDS

May 10, 2005

Mr. Robert A. McGuire
Associate Administrator for
Hazardous Materials Safety
DHM-1 400 7th St., S.W.
Washington, DC 20590-0001

DEPT. OF TRANSPORTATION
DOCKETS
2005 MAY 26 PM 4:55

Subject: US-DOT Regulatory Adoption of ASME BPV Code Section XII Rules for Construction and Continued Service of Transport Tanks-2004 edition

Dear Mr. McGuire:

The American Society of Mechanical Engineers (ASME) respectfully requests that the U.S. Department of Transportation consider regulatory adoption of ASME Boiler and Pressure Vessel Code Section XII into § 171.8 of Title 49, Code of Federal Regulations.

Last year, ASME published BPV Code Section XII Transport Tanks-2004 edition. This new section of the Boiler and Pressure Vessel Code contains requirements for construction and continued service of pressure vessels for the transportation of dangerous goods with design pressures appropriate for the transportation mode and volumes greater than 450 liters (120 gallons) via highway, railway, air, or water. The requirements for construction cover materials, design, fabrication, examination, inspection, testing, certification, and over-pressure protection. The requirements for continued service cover inspection, testing, repair, alteration, and recertification of a transport tank that has been in service. Coverage for transport tanks includes the pressure vessel, appurtenances, and additional components that are covered by Modal Appendices for the specific transport modes and unique service conditions of the specific application. The first edition contains a Modal Appendix for portable tanks transporting cryogenic fluids. Future editions will expand coverage to include non-cryogenic portable tanks, cargo tanks, rail tank cars, and ton tanks.

We would be pleased to meet with you to discuss this request if you desire. In the interim, please contact the undersigned with any questions you might have.

Sincerely,

G.M. Eisenberg
Director, Pressure Technology Codes and Standards
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cc: Stacey Gerard, Acting Asst. Admin & Chief Safety Officer, PHMSA-USDOT
Charles Hochman, Director, Office of Hazardous Mater. Technology-USDOT
Allen Selz-Chair, ASME BPV Subcommittee on Transport Tanks
June Ling-ASME Associate Executive Director, Codes and Standards