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January 12, 2001

Mr. Robert A. McGuire  
Associate Administrator  
Research and Special Programs Administration  
United States Department of Transportation  
400 Seventh Street, S.W.  
Washington, DC 20590-0001

**Subject: Nonmetallic Pipe on DOT 407 Cargo Tanks**

Dear Mr. McGuire:

Currently, "the use of nonmetallic pipes, valves or connections are authorized on DOT 412 cargo tanks." See 49 CFR § 178.348-3.

Since the **Hazardous Materials Table** permits the carriage of corrosive products (e.g., Sulfuric Acid, UN 1830) in both DOT 407 and DOT 412 tanks, we suggest an addition to § 178.347 to permit the use of nonmetallic pipes, valves or connections on DOT 407 cargo tanks. Our rationale for this suggestion is as follows:

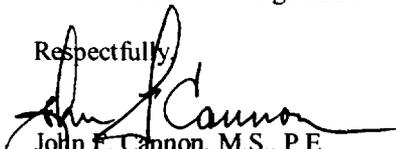
- Some nonmetallic piping is impervious to corrosive attack by acids (including sulfuric).
- As a result, the long-term integrity of the cargo tank piping system may be best assured through the employment of nonmetallic devices on DOT 407 cargo tanks hauling corrosive products.

Accordingly, we ask RSPA to consider the addition of the following passage:

**§178.347-6 Pumps, piping, hoses and connections.**

Each pump and all piping, hoses and connections on each cargo tank motor vehicle must conform to § 178.345-9, except that the use of nonmetallic pipes, valves, or connections are authorized on DOT 407 cargo tanks.

Respectfully,

  
John F. Cannon, M.S., P.E.  
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