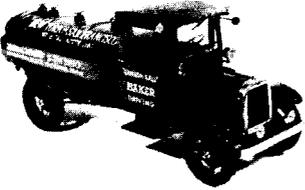


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December 1, 1992

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Alan I. Roberts
Associate Administrator
Office of Hazardous Materials Transportation **DHM-1**
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh St. S.W.
Washington DC 20590

Re: Petition to incorporate NFPA 385 Section 2-7, "**SEPARATION TO PREVENT INTERMIXING**" into 49 CFR.

In order to safely transport and dispense gasoline and heating oil, NFPA 385 Section 2-7 should be incorporated into 49 CFR. Section 2-7 reads:

SEPARATION TO PREVENT INTERMIXING. Tank vehicles designed to transport Class I (EXAMPLE: GASOLINE) liquid in one or more compartments and Class II or III (EXAMPLE FUEL OIL) liquid in other compartment or compartments, or to transport chemically non-compatible liquids, shall be provided with double bulkheads and shall be equipped with separate piping, pumps, meters, and hoses for such classes of product.

Because of the Hazardous Materials Transportation Uniform Safety Act (HMTUSA), states may choose not to enforce NFPA 385, or NFPA 385 may be eliminated. Without the requirement of "**SEPARATION TO PREVENT INTERMIXING**", gasoline could be mixed with heating oil and end up in a heating oil furnace, possibly causing an explosion, fire and/or death.

Please consider incorporating the "**SEPARATION TO PREVENT INTERMIXING**" paragraph from NFPA 385 2-7 into 49 CFR, possibly under 178.345 "General Design and Construction Requirements".

Respectfully,

David M. Lawler
Tank Truck Manufacturing, Inc.