

RSPA-1995-14834-1

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RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
U.S. DEPARTMENT OF TRANSPORTATION
400 SEVENTH STREET, S.W.
WASHINGTON, D.C. 20590

3-2-95

RE: PETITION TO REVISE 178.345-14, CARGO TANK NAMEPLATE AND SPECIFICATION PLATE ATTACHMENT.

DR. SHARMA-

WE PETITION FOR THE FOLLOWING CHANGE TO 49 CFR 178.345-14(a), THE THIRD SENTENCE TO READ AS FOLLOWS WHERE UNDERLINING INDICATES OUR RECOMMENDED ADDITION:

(a).....METAL PLATES PRESCRIBED BY PARAGRAPHS (b), (c), (d), AND (e) OF THIS SECTION, MUST BE PERMANENTLY AFFIXED TO THE TANK OR IT'S INTEGRAL SUPPORTING STRUCTURE, BY BRAZING, OR WELDING AROUND THE PLATE PERIMETER OR BY RIVETING.

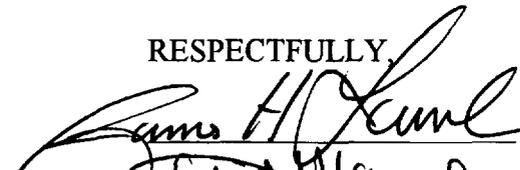
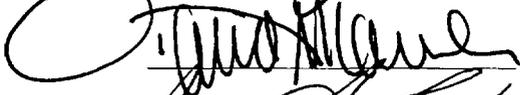
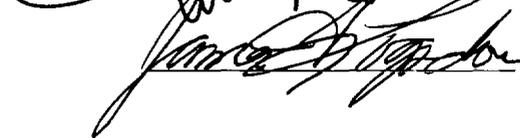
PREVIOUSLY, 178.340-10(b) STATED THAT PLATES COULD BE RIVETED. THIS HAS WORKED VERY WELL FOR MC 306 TANKS. WE HAVE MANUFACTURED TRUCK TANKS SINCE THE 1950's AND HAVE NOT HAD ANY PROBLEMS WITH RIVETED PLATES COMING OFF, OR CORROSION BEHIND A STAINLESS PLATE.

AN ADDITIONAL PROBLEM WITH REQUIRING THE PLATE TO BE WELDED ON THE 400 SERIES TANKS IS THAT A TYPICAL TRUCK MOUNTED TANK IS TRANSFERRED TO AN AVERAGE OF THREE CHASSIS DURING IT'S LIFESPAN. THIS MAY MEAN THAT THE PLATE NEEDS TO BE CHANGED, BECAUSE THE INFORMATION ON THE SPECIFICATION PLATE WILL CHANGE PER 178.345-14(c), (1) AND (2). TO CUT OFF A WELDED METAL PLATE AND WELD ON ANOTHER WOULD BE A SIGNIFICANT COST OVER REPLACING A RIVETED PLATE, ESPECIALLY IF THE PLATE IS AFFIXED TO THE TANK SHELL AND THE WELDING WOULD TRIGGER A PRESSURE RETEST.

THE COST REDUCTION TO A MANUFACTURER OF BEING ABLE TO USE ONE PLATE FOR MILD STEEL, STAINLESS STEEL, AND ALUMINUM TANKS WHEN RIVETED IS SIGNIFICANT, AND COMPOUNDS WHEN THE INCREASED LABOR TO WELD A PLATE ON IS CONSIDERED. ALSO, MANY TANKS ARE PAINTED, AND ADDITIONAL LABOR WOULD BE REQUIRED TO TAPE OFF A WELDED PLATE TO PROTECT IT FROM PAINT. ANOTHER BENEFIT OF A RIVETED PLATE IS THAT A MANUFACTURER COULD USE A MORE DURABLE STAINLESS PLATE ON AN ALUMINUM TANK, AS WE DO NOW FOR MC 306-AL. WE ESTIMATE THE ADDITIONAL COST OF A WELDED PLATE OVER A RIVETED PLATE ON A PAINTED DOT 406 TANK TO BE \$200.00-250.00 PER UNIT.

IN SUMMATION, WE FEEL THAT A RIVETED PLATE WILL DO EVERYTHING THAT DOT REQUIRES, AND HAVE THE ADDED BENEFITS OF BEING EASIER, MORE ECONOMICAL, AND MORE DURABLE FOR ALUMINUM TANKS.

RESPECTFULLY,

 JAMES H. LAWLER, PRES.
 DAVID M. LAWLER, VICE PRES.
 J. F. LOGSDON, CHF. ENGR.