

TO: Distribution

FROM: M. M. Goodreau

DATE: March 29, 1987

Interoffice
Communication

SUBJ: MURIATIC ACID TRUCKS

HM
XXF: mmb

FILE 287.9

VISTA

Attached is written confirmation from the U.S. Department of Transportation stating that empty muriatic acid trucks can be transported back to the plant under pressure provided they are offered for shipment in the same manner as when full. "In the same manner" refers to shipping papers, labeling, marking and placarding.

If you have any questions on this letter or hazardous materials regulations, feel free to contact me.

M. M. Goodreau

M. M. Goodreau

ajo
.6

Attachment

Distribution:

W. L. McClain
F. Thomas
J. D. Zuilhuf
J. B. Callaway
J. D. Laratta
D. C. Skokna

A. T. O'Donnell
R. L. Johnson
P. A. Bertas
J. L. Nigro
I. J. Mlachak

VEU 000090840



U.S. Department
of Transportation

Research and
Special Programs
Administration

400 Seventh Street, S.W.
Washington, D.C. 20590

Mr. M.M. Goodreau
Environmental Health Specialist
Vista Chemical Company
15990 N. Barker's Landing Road
Houston, Texas 77224

MAR 16 1987

Dear Mr. Goodreau:

This is in response to your telephone conversation with Helen Engrum, of my staff, and your subsequent letter of December 30, 1986, concerning requirements in 49 CFR 173.29(c) as they apply to transporting empty cargo tanks containing a residual amount of hydrochloric acid and nitrogen.

Specifically, you asked whether a cargo tank which previously contained hydrochloric acid and was unloaded using nitrogen at a pressure of 20 psig can be transported with nitrogen at pressures under 20 psig remaining in the tank.

The answer is yes. The empty cargo tank would be offered for transportation in the same manner as when it previously contained a greater quantity of hydrochloric acid. Please be aware of the fact that if the gas pressure exceeds 40 psia (25.7 psig), the gas would be a "Compressed gas" (see 49 CFR 173.300) and the shipment would be prohibited.

If we can be of further assistance, please contact us.

Sincerely,

Thomas J. Charlton
Chief, Standards Division
Office of Hazardous Materials
Transportation

VEV 000090841