

## FACT SHEET: BOBTAIL REQUALIFICATION

### Summer 2018

#### General Information

Several years ago, NPGA petitioned the U.S. Department of Transportation (DOT) to extend the hydrostatic pressure test requalification period for certain types of bobtail trucks from 5 years to 10 years. NPGA's petition was based on extensive research funded by PERC that demonstrated no reduction in safety to extend the period for certain types of bobtails. DOT determined that the petition had merit and, after a period of public review and comment, issued a Final Rule effective on July 5, 2016 to extend the hydrostatic pressure test requalification period from 5 to 10 years.

On June 18, 2018 DOT published a Correction Notice to correct several typographical errors contained in the Final Rule that led to industry confusion. The Correction Notice also clarifies when bobtails are eligible for the 10 year requalification period.

The information presented below addresses the new requirements, is intended to provide general information based on the understanding of NPGA staff, and is not legal advice. Please contact NPGA staff [Mike Calderera](#) or [Sarah Reboli](#) with any questions.

#### Eligible Bobtails

Bobtails that meet the following requirements are eligible for the 10 year requalification period:

- MC 331 cargo tanks of less than 3,500 gallons water capacity in dedicated propane service constructed of nonquenched and tempered (NQT) SA-612 steel.
- MC 331 cargo tanks of less than 3,500 gallons water capacity in dedicated propane service constructed of NQT SA-202 or NQT SA-455 steels provided the materials for these steels have full-sized equivalent (FSE) Charpy vee notch (CVN) energy test data that demonstrated 75% shear-area ductility at 32 degrees Fahrenheit with an average of 3 or more samples >15 ft-lb FSE with no sample <10 ft-lb FSE.<sup>1</sup>

#### Start Date

According to the Correction Notice, the 10-year period for eligible bobtails applies *from the date of the most recent* hydrostatic pressure test and internal visual inspection.<sup>2</sup> In the Correction Notice, DOT states that eligible bobtails tested or inspected prior to the July 5, 2016 effective date of the Final rule do not have to complete the 5-year cycle before being able to test or inspect on the 10-year cycle.

Note that prior to publication of the Correction Notice, DOT advised that only hydrostatic pressure tests and internal visual inspections performed *after* July 5, 2016 were eligible for the 10 year requalification period.<sup>3</sup>

---

<sup>1</sup> **Typographical Error:** The initial publication of the Final Rule incorrectly indicated bobtails made of SA-612 steel required the same test data as bobtails made of SA-202 and SA-455 steels to be eligible for the 10 year requalification period. On June 18, 2018 DOT published a correction in the Federal Register, available online [here](#).

<sup>2</sup> **Start Date:** On June 18, 2018 DOT published a correction in the Federal Register to clarify the when eligible bobtails may take advantage of the extended requalification period, available online [here](#).

<sup>3</sup> **Typographical Error:** There was an error in the initial publication of the Final Rule that indicated the Start Date for pressure tests was September 1, 2017 while the Start Date for internal visual inspection was September 1, 2016.

## Common Questions

**Question 1: How do I know if a bobtail is made of SA-612, SA-202, or SA-455 steel?**

- a) Cargo tanks must have a Name Plate permanently attached to the outside of the tank. The Name Plate details the material specification of the tank, which identifies if the bobtail is eligible for the 10 year requalification period (49 CFR 178.337-17).

**Question 2: What if a bobtail does *not* have a Name Plate?**

- a) Cargo tank motor vehicle manufacturers must provide, and cargo tank owners must retain for the lifetime of the bobtail plus one year, an ASME Manufacturer's Data Report for each cargo tank, which details construction and compliance information for the bobtail (49 CFR 178.337-18). The Data Report should contain information identifying the material specification of the steel and/or the necessary test data to determine the eligibility of a bobtail for the 10 year requalification period.

In addition to relying on this information for the requalification period, the bobtail owner may use the Data Report to obtain a replacement Name Plate.

**Question 3: What if I do *not* have the Data Report detailing the test data necessary for a bobtail made of SA-202 or -455 steel?**

- a) If the bobtail was registered with the National Board of Boiler and Pressure Vessel Inspectors, a copy of the Data Report can be requested by the owner of the bobtail.

National Board of Boiler and Pressure Vessel Inspectors  
1055 Crupper Avenue  
Columbus, OH 43229  
T: (614) 888-8320  
[www.nationalboard.org/](http://www.nationalboard.org/)

- b) If the bobtail was *not* registered with the National Board of Boiler and Pressure Vessel Inspectors, the owner may record identification information of the bobtail and receive conformity certification by a Registered Inspector of the National Board of Boiler and Pressure Vessel Inspectors.

**Question 4: If a bobtail received an Internal Visual Inspection and/or Pressure Test before July 5, 2016, can I wait a total of 10 years?**

- a) Yes, if the bobtail meets the eligible criteria. According to the Correction Notice by DOT, the 10 year requalification period begins from the most recent test dates. DOT states "...eligible cargo tanks tested or inspected prior to the effective date [of July 5, 2016] do not have to complete the 5-yr cycle before being able to test or inspect on a 10-year cycle."<sup>4</sup>

---

<sup>4</sup> Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Hazardous Materials: Miscellaneous Amendments; Response to Appeals; Corrections, 83 Fed. Reg. 117, 28164 (published June 18, 2018) (to be codified at 49 C.F.R. pt. 172, 172, and 180).

For example: An eligible bobtail receives and passes an Internal Visual Inspection and/or Pressure Test in February 2013. According to the Correction Notice, the bobtail owner can wait until February 2023 to proceed with the Internal Visual Inspection and/or Pressure Test; 10 years from the most recent test date. Thereafter, the next Inspection and/or Pressure Test would be due in February 2033.

**Question 5: If a bobtail is due for an Internal Visual Inspection and/or Pressure Test after July 5, 2016, can I wait a total of 10 years?**

a) Yes, if the bobtail meets the eligible criteria. The Correction Notice clarifies that the 10 year requalification period applies to the most recent test dates regardless of whether that date is before or after the July 5, 2016 effective date of the Final Rule.

**Regulatory Text<sup>5</sup>**

**49 CFR 180.407(c) Requirements for test and inspection of specification cargo tanks  
COMPLIANCE DATES—INSPECTIONS AND TEST UNDER § 180.407(c)**

Test or inspection (cargo tank specification, configuration, and service)	Date by which first test must be completed (see Note 1)	Interval period after first test
*	*	*

Internal Visual Inspection:

All insulated cargo tanks, except MC 330, MC 331, MC 338 (see Note 4) ...	September 1, 1991.....	..... 1
All cargo tanks transporting lading corrosive to the tank .....	September 1, 1991.....	..... 1
MC 331 cargo tanks less than 3,500 gallons water capacity in dedicated propane service constructed of nonquenched and tempered NQT SA-612 steel (see Note 5) .....	.....	..... 10
All other cargo tanks, except MC 338	September 1, 1995.....	..... 5

\*

Pressure Test (Hydrostatic or pneumatic) (See Notes 2 and 3):

All cargo tanks which are insulated with no manhole or insulated and lined, except MC 338 .....	September 1, 1991.....	..... 1
All cargo tanks designed to be loaded by vacuum with full opening rear heads.....	September 1, 1992.....	..... 2
MC 330 and MC 331 cargo tanks in chlorine service .....	September 1, 1992.....	..... 2
MC 331 cargo tanks less than 3,500 gallons water capacity in dedicated propane service constructed of nonquenched and tempered NQT SA-612 steel (see Note 5) .....	.....	..... 10
All other cargo tanks .....	September 1, 1995.....	..... 5

<sup>5</sup> Corrected regulatory text is available online: [https://www.ecfr.gov/cgi-bin/text-idx?SID=e2e0696843a853e23d20cbf1be162519&mc=true&node=se49.3.180\\_1407&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=e2e0696843a853e23d20cbf1be162519&mc=true&node=se49.3.180_1407&rgn=div8)

**Note 1:** If a cargo tank is subject to an applicable inspection or test requirement under the regulations in effect on December 30, 1990, and the due date (as specified by a requirement in effect on December 30, 1990) for completing the required inspection or test occurs before the compliance date listed in table I, the earlier date applies.

**Note 2:** Pressure testing is not required for MC 330 or MC 331 cargo tanks in dedicated sodium metal service.

**Note 3:** Pressure testing is not required for uninsulated lined cargo tanks, with a design pressure MAWP 15 psig or less, which receive an external visual inspection and lining inspection at least once each year.

**Note 4:** Insulated cargo tanks equipped with manholes or inspection openings may perform either an internal visual inspection in conjunction with the external visual inspection or a hydrostatic or pneumatic pressure-test of the cargo tank.

**Note 5:** A 10-year inspection interval period also applies to cargo tanks constructed of NQT SA-202 or NQT SA-455 steel provided the materials have full-size equivalent (FSE) Charpy vee notch (CVN) energy test data that demonstrated 75% shear-area ductility at 32 degrees F with an average of 3 or more samples >15 ft-lb FSE with no sample <10 ft-lb FSE.