

MEMORANDUM

To: TFI Transportation Committee  
EHS&S Committee  
TFI Affiliated State Associations

Cc: National Tank Truck Carriers  
American Trucking Associations

From: Justin Louchheim, Director of Government Affairs

Subject: Water in Ammonia Testing Methods: SP Issued for new method

Date: October 18, 2017

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Anhydrous ammonia shipped in DOT Specification MC-330 or MC-331 cargo tanks must have a minimum water content of 0.2 percent in anhydrous ammonia. As part of TFI's strategic plan and with an eye toward enhanced safety and efficiencies, we have been working with TFI members and interested parties on new testing method(s) for determining the minimum water content of 0.2 percent.

I am pleased to report that the Department of Transportation has approved a [Special Permit for a new testing method](#). The testing method was developed by [Orono Spectral Solutions, Inc. \(OSS\)](#). The Special Permit approval was entirely based on DOT's review and determination that the method is safe and accurate. TFI was pleased to work with OSS and DOT to ensure the review process went smoothly.

Relative to the other accepted testing method, which largely relies on evaporation, the new OSS method promotes safety by being enclosed and requiring a smaller sample size, minimizing worker exposure. It also is more efficient, taking less than 30 minutes versus more than three hours for the other method.

While TFI does not endorse specific products, we do want to make this information available to TFI members and ammonia shippers.

All the best,  
Justin

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