

**ISSUE NUMBER**

20-037-VEH

**ISSUE NAME**

Operational Policy 15 - Oil and Grease Leaks

**STATUS**

Closed

Vehicle Committee

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The current language in Operational Policy 15 indicates the following:

OIL AND GREASE LEAKS - Regulatory Guidance

b.(3) At what point should an oil and/or grease leak be written as a violation of 396.5?

ANSWER: A violation should not be written until the seepage or leak is great enough to form drops and drip during an inspection.

**JUSTIFICATION OR NEED**

Discussion has come up as to whether or not this guidance includes hub seal leaks. The minutes and results of the initial issue requests does not specify what leaks this guidance pertains to. If the guidance does not apply to all leaks, it needs to be amended to clarify that hub seal leaks are not included.

**REQUEST FOR ACTION**

Amend Operational Policy 15 to exclude hub seal leaks. Leaks in inner wheel seals are often active but not dripping during inspection, particularly those that are grease packed. Discussion in committee at the time of the addition was that the dripping leak portion in Ops 15 referred to general leaks (oil pan leaks, transmission leaks, PS fluid leaks, etc.). An "active leak" on a hub is anything that includes fresh oil/grease. They frequently don't drip during the inspection, but they will spray all over when the wheels are rotating and inertia kicks in.

The OOS adequately quantifies the leak by indicating that it must be to the extent of contaminating the brake linings. If the evidence of fresh oil or grease is present, it should be considered leaking without a requirement of a drip or drops.

Suggest an amendment as follows:

OIL AND GREASE LEAKS - Regulatory Guidance

b.(3) At what point should an oil and/or grease leak (other than a hub seal leak) be written as a violation of 396.5?

ANSWER: A violation should not be written until the seepage or leak is great enough to form drops and drip during

an inspection.

#### **ACTION TAKEN BY COMMITTEE**

Discussion among the committee was that the current language in Ops Policy 15 for dripping is inclusive of hubs. Hubs don't normally drip but can be very wet from seeping. Many jurisdictions would mark a violation for wet hubs even when it is not dripping. A lot of equipment will leak slightly and looks wet and it is not an issue. Hubs was added into this originally with the intention of seeing dripping. Industry commented that many vehicles out there, even new ones will seep. There was a lot of discussion on the difference between hubs and wheel seals. The hubs have a vent hole that allows for oil to come out of the hole. The original intent of the action item was for wheel seals only and not to include hubs.

It was discussed that there has been confusion by industry and inspectors on whether a leaking inner wheel seal that has not contaminated the brake yet, is a violation of 396.5 (oil leak) and proposed changes to OPS 15 was shown to the committee. There was some discussion about the nomenclature of the proposed wording. A lot of discussion from both industry and roadside inspectors about the differences between the inner seal and the hub and what fresh oil means around each of them. It was stated that the hub is in the OOSC and there is no need to have it in OPS 15.

After discussion, it was the consensus of the committee that an actively leaking inner wheel seal, which has evidence that further leakage will occur, is a violation of 396.5. A motion to add new Regulatory Guidance into Operational Policy 15, under Part 14, Wheels, Rims and Hubs that an inner wheel seal with fresh or active leakage and evidence that further leaking will occur shall be documented as a violation of 396.5 and to amend the language in Part XX, Miscellaneous b(3).

#### **14. WHEELS, RIMS AND HUBS**

b.(1) Is a leaking inner wheel seal, without evidence of wet contamination of the brake friction material, a violation?

ANSWER: Yes, If there is fresh or active leakage from the inner wheel seal and there is evidence that further leaking will occur.

#### **XX. MISCELLANEOUS**

b.(3) At what point should an oil and/or grease leak (other than a hub or inner wheel seal) be written as a violation?