

ISSUE NUMBER

22-023-VEH

ISSUE NAME

Operational Policy 15 - Guidance for 396.3(a)(1) - Hydraulic Fluid Leaks

STATUS

Open

Vehicle Committee

NAME

Eric Sundby

AGENCY

MN State Patrol

ADDRESS

1110 Centre Pointe Curve, Suite 410
Mendota Heights, Minnesota 55120
United States

PHONE

12183960866

EMAILeric.sundby@state.mn.us**SUMMARY OF ISSUE**

Change to OOS on page 31 under O. Hydraulic Brakes (6)

JUSTIFICATION OR NEED

Currently only 393.45(a) is listed as the violation. This regulation is only applicable to lines and hoses and fittings. Adding 396.3(a)(1) for other areas of leaks in the system.

REQUEST FOR ACTION

Add 396.3(a)(1) for observable leaks in the system upon full application for leaks at other areas than hose or line, Example, Caliper, Master Cylinders, Brake Booster Assembly, ECT.

ACTION TAKEN BY COMMITTEE

The Vehicle Committee determined 396.3(a)(1) should be limited in use and agreed that a petition currently with FMCSA for 396.3(a)(1) be amended to add the violation conditions currently outlined in Operational Policy 15 for air leaks and the OOSC for hydraulic leaks.

The modification to the table that accompanies 396.3(a)(1) to include language to reflect the conditions outlined in Operational Policy 15 b.(3):

- Leaking brake valve
- Leaking reservoir
- Any other brake system leaks

and an OOSC condition for hydraulic brake leak from other than a brake line was added.

In the interim, 396.3(a)(1) was added to the OOSC for hydraulic fluid leaks that are not from a brake line.

This issue will remain open for a response on the petition.