

ISSUE NUMBER

24-007-HAZ

ISSUE NAME

Operational Policy 4 - Cargo Tank Certification

STATUS

Closed

Hazardous Materials Committee

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AGENCY

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Operational Policy 4 for cargo tank inspection initial certification and certification maintenance wording leaves open different understanding of what is a cargo tank for certification purposes.

JUSTIFICATION OR NEED

Operational Policy 4 should be updated to clarify what is a specification cargo tank for certification purposes. In conversation with one of our inspectors, it was mentioned by the inspector that a non-specification cargo tank that was BUILT under the specifications for an MC306 cargo tank could still count towards certification even though the cargo tank specification was removed as in 180.405(j). Ops Policy 4 Under Cargo Tank Inspection Maintenance of Certification (Page 14) states "(specification cargo tanks are not limited to DOT or MC series tanks but also may include CGA, ASME, TC, vehicles operated under IMESLP 23 or other cargo tanks built to specification codes)" I feel the "built" in this statement leaves it open to interpretation on what cargo tanks count towards your certification. The intent has always been that only specification cargo tanks count toward certification, however, with the addition of some other packages the intent of the policy is not clear.

Additionally, the IMESLP 23 was left off Ops Policy 4 for the initial certification (page 6) when it appears in the certification maintenance part.

REQUEST FOR ACTION

Please refer to the Word document attached. The requested changes to Ops Policy 4 are in red and highlighted.

SUPPORTING DOCUMENTS/PHOTOS

- [CVSA-Operational-Policy-4-Cargo-Tank-Inspection-Certification-Action-Item.docx](#)

ACTION TAKEN BY COMMITTEE

Operational Policy 4 was amended to include IME-SLP 23 tanks for an inspector's initial Cargo Tank Inspection certification. The committee did not recommend further changes to Operational Policy 4 regarding the inspection of specification cargo tanks withdrawn from certification.