Part 387

**Section § 387.9: Financial responsibility, minimum levels.**

## Guidance Q&A

**Question 5: What level of insurance is required for a motor carrier operating a tube trailer where the cylinders are manifolded together. Each separate cylinder has a capacity less than 3,500 water gallons, but the total capacity of all the cylinders on the vehicle is in excess of 3,500 water gallons?**

**Guidance:** $5,000,000 of insurance is required, for the reasons given above. The table in §387.9 refers to “in bulk Division 2.1 or 2.2 materials.” The definition of in bulk in §387.5 includes “the transportation, as cargo, of property … in containment systems with capacities in excess of 3,500 water gallons.” In this case, a group of cylinders manifolded together qualify as “containment systems.” As in the answer to Guidance Question 4, the table describes the vehicle in the singular. As long as the containment systems transported on a single vehicle have a total capacity of at least 3,500 water gallons, $5,000,000 of insurance is required.