



U.S. Department
of Transportation

Memorandum

**Federal Motor Carrier
Safety Administration**

**Subject: SAFETY NOTICE ON BENCH TESTING
OF PRESSURE RELIEF DEVICES (PRDs)**

Date: **OCT 27 2014**

From: Federal Motor Carrier
Safety Administration

Reply to
Attn. of: MC-ECH

To: All Cargo Tank Manufacturing,
Testing, and Repair Facilities

Recent investigations conducted by the U.S. Department of Transportation, Federal Motor Carrier Safety Administration (FMCSA) on USDOT specification cargo tank testing and repair facilities have resulted in a consistent pattern of non-compliance regarding bench testing of Pressure Relief Devices (PRD). Specifically, cargo tank testing and repair facilities are either failing to bench test PRDs or failing to test them appropriately by not determining the proper start-to-discharge and closing pressures.

Due to the extent of this problem, FMCSA is issuing this Safety Notice to increase awareness of the regulatory requirements for PRDs.

Pursuant to 49 CFR Section 180.407(g)(1)(ii), ALL self-closing pressure relief valves, including emergency relief vents and normal vents, MUST be removed from the cargo tank for inspection and testing prior to the pressure test being conducted. In addition, per Section 180.407(d)(3), ALL reclosing pressure relief valves on cargo tanks transporting lading corrosive to the valve must be removed annually for inspection and testing during the external visual inspection.

Section 180.417(b)(2)(iii) requires test report forms to include information about pressure relief vents that are removed, inspected and tested or replaced, including the type of device, set-to-discharge pressure, pressure at which device opened, pressure at which device reseated, and a statement of disposition of the device (e.g., reinstalled, repaired, or replaced).

The PRDs are an integral part of the safety mechanisms for specification cargo tanks and are vital to ensuring highway safety of hazardous materials. Failing to properly conduct bench testing of a hazardous materials cargo tank during the pressure test is not only a safety hazard, but is a violation of the Federal Hazardous Materials Regulations (FHMR). **A specification cargo tank that has had a pressure test where the pressure relief devices have NOT been tested as prescribed is NOT authorized for the transportation of hazardous materials.**

Registered Inspectors who have not bench tested the PRDs during a pressure test should NOT sign the report form indicating the cargo tank is qualified and meets the requirements of the DOT

specifications.

Registered Inspectors are also required to ensure that the PRD is correct for the cargo tank in which it is placed, and for ensuring that the venting capacity is sufficient for the cargo tank.

Cargo tank testing facilities are responsible for ensuring their Registered Inspectors (RIs) are trained and qualified to conduct bench testing of PRDs. This safety notice should be included as part of the HM training requirements specified in 49 CFR Section 172.700 of the FHMR.

If you have any questions regarding this safety notice, please contact the FMCSA Hazardous Materials Division at 202-385-2400.