

## **Safety Advisory: Limitations on the use of the EPA Method 27 Test in lieu of the Leakage Test on DOT Specification Cargo Tank Motor Vehicles.**

The Federal Motor Carrier Safety Administration (FMCSA) is issuing this safety advisory to provide notice to owners, operators and Registered Inspectors of Cargo Tank Motor Vehicles (CTMVs) concerning the limitations on the EPA Method 27 Test when used in lieu of the Leakage Test on DOT Specification CTMVs. The EPA Method 27 Test may be used only on CTMVs with vapor recovery equipment and in dedicated petroleum distillate service.

### **Background:**

49 CFR Section 180.407(h)(2) permits the use of the EPA Method 27 Test as a substitute for the leakage test for cargo tanks used to transport petroleum distillate fuels and equipped with vapor recovery equipment, as prescribed in Section 180.407(h)(1).

In interpretation No. 16-0048, the U.S. Department of Transportation (USDOT), Pipeline and Hazardous Materials Safety Administration (PHMSA) states that to be eligible for the EPA Method 27 Test, the CTMV must be "...in dedicated service for the transportation of petroleum distillate fuel."

In this interpretation, PHMSA defined a petroleum distillate fuel as "defined in the test as a petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals (4 psi) or greater which is used as a fuel for internal combustion engines."

### **Examples of Fuels Meeting the Reid Vapor Pressure (RVP):**

Gasoline (7.8 – 9 psi) and E-85 (7 – 12 psi) are petroleum distillate fuels for purposes of the EPA Method 27 Test. They meet the definition of a petroleum distillate and a CTMV used to transport these products in dedicated service is eligible to use the EPA Method 27 test. However, diesel fuel, biodiesel, ethanol, and methanol are not considered petroleum distillate fuels, and are not EPA Method 27 eligible.

### **Cautions:**

Owners and operators of CTMVs that transport petroleum distillate fuels used to power internal combustion engines should:

- Verify the RVP of the product transported prior to deciding whether the EPA Method 27 test could be used in lieu of the leakage test.
- Ensure that the correct leakage test is performed on their cargo tank depending on which hazardous materials are being transported.

- Inform their Registered Inspectors of all of the hazardous materials that a CTMV has transported since the last test was completed, so the Registered Inspector can make the proper determination of what types of tests and inspections to perform.

For more information, concerning this Safety Advisory, please contact Vincent Babich, Transportation Specialist, Hazardous Materials Division, FMCSA, at (202)366-4871, or by email at [vincent.babich@dot.gov](mailto:vincent.babich@dot.gov).