

# SPECIAL Report



NATIONAL ROOFING CONTRACTORS ASSOCIATION

June 29, 2000

On June 25, 1997, NRCA issued a special report regarding Department of Transportation (DOT) changes affecting the transportation of hazardous materials. As a reminder, effective **July 1, 2000**, nonspecification cargo tanks, sometimes referred to as trap wagons **will not be allowed to be transported in either interstate or intrastate commerce**. Trap wagons are single- or double-axeled trailers commonly used in the roofing industry to transport propane gas.

In an effort to make all intrastate and interstate regulations consistent, Congress mandated DOT's Research and Special Programs Administration (RSPA) to amend the Hazardous Materials Transportation Act of 1990. On Jan. 8, 1997, RSPA published its final rule, HM-200, extending the application of the hazardous materials regulations to intrastate transportation.

In the final rule, RSPA provided the following exceptions:

- Agricultural operations 49 CFR 173.5
- Materials of trade 49 CFR 173.6
- Nonspecification packagings used in intrastate commerce 49 CFR 173.8

In 49 CFR 173.8 (a), RSPA provided exceptions for nonspecification packagings to be used in intrastate transportation of propane gas until July 1, 2000. After July 1, 2000, only vehicles that comply with the specifications of MC-330, MC-331 or DOT-51 may be used in interstate or intrastate commerce of propane gas.

NRCA is investigating where roofing contractors can purchase cargo tanks that comply with MC-330, MC-331 or DOT-51 specifications. When this information becomes available, it will be posted on NRCA's Web site at [www.nrca.net](http://www.nrca.net). Until then, if industry professionals have any questions, would like to request a copy of the June 25, 1997 Special Report or know of a source from which this equipment can be purchased, please contact me or Joel Martin, NRCA's safety programs manager, at (800) 323-9545.

Sincerely,  
NRCA

A handwritten signature in black ink that reads "Ken Brown, CSP".

Ken Brown, CSP  
Director, Risk Management