



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

## **NOTICE OF ENFORCEMENT POLICY REGARDING THE TESTING AND INSPECTIONS OF CARGO TANK MOTOR VEHICLES**

The U.S. Department of Transportation’s (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) and Federal Motor Carrier Safety Administration (FMCSA) are providing notice that they will not take enforcement action against any person who transports U.S. DOT specification cargo tank motor vehicles (CTMVs) that are identified in this notice, and that have been tested and inspected by a person who was not qualified as a “Registered Inspector.” This notice of enforcement policy is effective through November 10, 2023.

Beginning in June 2023, during an investigation at Meeder Equipment Company Inc./Ransome Manufacturing in Fresno, California, FMCSA personnel discovered that 186 DOT specification CTMVs—primarily MC-330 and MC-331 CTMVs used to transport propane—had been tested and inspected by a person who did not meet the qualifications of a “Registered Inspector.” MC-330 and MC-331 CTMVs transporting propane must successfully undergo internal and external visual inspections, and leakage and pressure tests at intervals specified in § 180.407(c) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). The inspections and tests conducted on the 186 CTMVs included internal visual inspections and pressure tests dating back to July 2018, and external visual inspections and leakage tests dating back to July 2022. The affected CTMVs must be retested and reinspected by a qualified “Registered Inspector” to ensure they are compliant for hazardous materials transportation. Any person in possession of a CTMV described in this notice should contact Meeder Equipment Company Inc./Ransome Manufacturing to determine whether its CTMV is in compliance with the HMR. The contact information is as follows:

Meeder Equipment Company Inc./Ransome Manufacturing  
3495 S. Maple Avenue  
Fresno, CA 93725  
engineering@ransomemfg.com  
Phone: 559-485-0979

The HMR requires a cargo tank constructed in accordance with a DOT specification for which a test or inspection specified in the HMR has become due, may not be filled and offered for transportation or transported until the test or inspection has been successfully completed. Each specification cargo tank must be tested and inspected as specified in § 180.407(c) by an inspector meeting the qualifications prescribed in § 180.409 (Minimum qualifications for inspectors and testers). Section 180.409 requires that any person performing or witnessing the inspections and tests must have the training and experience required to meet the definition of a “Registered

Inspector,” as provided in § 171.8 of the HMR. As defined in § 171.8, a “Registered Inspector” is a person registered with DOT in accordance with subpart F of part 107 who has the knowledge and ability to determine whether a cargo tank conforms to the applicable DOT specification. A “Registered Inspector” meets the knowledge and ability requirements in one of the following ways:

- (1) Has an engineering degree and one year of work experience relating to the testing and inspection of cargo tanks;
- (2) Has an associate degree in engineering and two years of work experience relating to the testing and inspection of cargo tanks;
- (3) Has a high school diploma (or General Equivalency Diploma) and three years of work experience relating to the testing and inspection of cargo tanks; or
- (4) Has at least three years’ experience performing the duties of a “Registered Inspector” prior to September 1, 1991.

Because the CTMVs described in this notice were inspected and tested by a person who did not meet the requirements of a “Registered Inspector,” the CTMVs will require retesting and reinspection to ensure they are compliant and suitable for the safe transportation of hazardous materials. However, as no imminent safety vulnerabilities have been identified to date, PHMSA and FMCSA will not take enforcement action against any person who transports U.S. DOT specification CTMVs identified in this notice and have been tested and inspected by a person who was not qualified as a “Registered Inspector.” This relief applies only to transportation by motor vehicle, and does not extend to transport by air, vessel, or railroad.

This document is a temporary notice of enforcement policy. Regulated entities may rely on this notice as a temporary safeguard from Departmental enforcement as described herein. To the extent this notice includes guidance on how regulated entities may comply with existing regulations, it does not have the force and effect of law and is not meant to bind the regulated entities in any way. This notice of enforcement policy is effective through November 10, 2023.

Issued August 11, 2023, in Washington D.C.



**William S. Schoonover**  
Associate Administrator, Office of Hazardous Materials Safety  
Pipeline and Hazardous Materials Safety Administration.