

INFORMATION BULLETIN



April 21, 2025

MARKING OF MANUALLY-ACTIVATED REMOTE SHUTOFF DEVICES FOR THE CLOSURE OF INTERNAL SELF-CLOSING STOP VALVES ON SPECIFICATION CARGO TANKS

The purpose of this Information Bulletin (IB) is to provide information regarding the marking of manually-activated remote shutoff devices on specification cargo tanks. For the purposes of this IB, a specification cargo tank is defined in Title 49, Section 171.8 of the Code of Federal Regulations (CFR). In general, specification cargo tanks are those conforming to one of the specifications or standards contained in Title 49 CFR, Part 178. Examples of specification cargo tanks include, but are not limited to, DOT 406, DOT 407, DOT 412, and MC 331.

Background

Beginning October 3, 2005, Title 49, Section 172.328(d) CFR, required that “each on-vehicle manually-activated remote shutoff device for closure of the internal self-closing stop valve must be identified by marking ‘Emergency Shutoff’ in letters at least 0.75 inches in height, in a color that contrasts with its background, and located in an area immediately adjacent to the means of closure.” Since the implementation of this regulatory requirement in 2005, each specification cargo tank’s manually-activated remote shutoff device for the closure of the internal self-closing stop valve was required to be marked with the words “Emergency Shutoff” without exception.

Pipeline and Hazardous Materials Safety Administration Interpretation

On December 20, 2024, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued Interpretation #24-0100, regarding the marking requirement contained in Title 49, Section 172.328(d) CFR. This interpretation was provided in response to a question regarding whether it was the intent of the regulations to prohibit the use of a hyphen in the word shutoff, i.e. “shut-off.” In their response, the PHMSA stated, “Although the required text of ‘Emergency Shutoff’ provided in § 172.328(d) does not include a hyphen in the word shutoff, it is the opinion of this Office that inserting a hyphen as described is not contrary to the intent of the requirement and does not cause confusion, alter, or diminish the meaning or effectiveness of the marking.”



As a result of PHMSA Interpretation #24-0100, specification cargo tank manually-activated remote shutoff devices for the closure of internal self-closing stop valves marked with “Emergency Shutoff” or “Emergency Shut-off” are in compliance with Title 49, Section 172.328(d) CFR. This PHMSA interpretation does not change or otherwise impact the requirements for the marking to have “letters at least 0.75 inches” in height, be in a color that contrasts with its background, and be in an area immediately adjacent to the means of closure.

Questions regarding this IB should be directed to Commercial Vehicle Section, at (916) 843-3400.

OFFICE OF THE COMMISSIONER

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