

Information on “Registered Inspector” for HM225a inspections (Negotiated DOT Cargo Tank Requirements).

The negotiated DOT Cargo Tank Requirements refer to inspections which have to be performed by a “Registered Inspector.” If you, or someone in your company wants to register as an Inspector with the DOT, there are several requirements to be met.

First, as is normal with almost all regulations, DOT provides the requirements, and later lists the exceptions.

The requirements in CFR49 171.8 state the person must have one of the following:

1. An engineering degree and one year of work experience, or
2. An associate degree and two years of work experience, or
3. A high school diploma (or general equivalency diploma) and three years of work experience.
4. At least three years experience in performing the duties of a Registered Inspector by September 1, 1991, and was registered with the DOT by December 31, 1995.

Now for the relevant exceptions listed in CFR 49 180.409:

1. A person who only performs annual external visual inspections and leakage tests on a cargo tank motor vehicle, owned or operated by that person, with a capacity of less than 3,500 gallons used exclusively for flammable liquid petroleum fuels, is not required to meet the educational and years of experience requirements. However, this person must have the knowledge and ability to perform such inspections and tests and must perform them as required by the regulations, and must register as required.
2. External and internal visual inspections must be accomplished by a Registered Inspector, but the hydrostatic test, may be done by an employee who is not a Registered Inspector provided:
 - a. The employee is familiar with the cargo tank and is trained and experienced in the use of the inspection and testing equipment used
 - b. The employer submits certification that such employee meets the qualification requirements to the DOT.
 - c. The employer retains a copy of the tester’s qualifications with the truck files.

The following telephone numbers are to the FMCSA Hazardous Materials Section in Washington, DC. This branch is responsible for administering the registrations as of March 2005:

202-366-2172

202-366-6121

202-366-2884

202-366-1705

202-366-0476

202-493-0496

A far easier way to register exists if you have an internet connection; go to www.safersys.org and click on “fmcsa registration and updates.” Choose “new or additional registration,” and scroll down to the bottom of the page to click “continue.” On the next page choose the option that shows “ct number (cargo tank facility).” From there, follow the prompts to complete your registration.