



Information Updates and Communications

Date: 02-03-2010

Subject: Wet Lines Update
Distribution: All RSMs and liquid dealers

We have been getting many questions regarding wet lines and their imminent ban. Here is the latest information:

HR 4016 passed the House Transportation and Infrastructure committee back in November, 2009. It was originally thought that the bill would go directly into both houses of Congress and be passed by the spring of 2010. Various situations have arisen which seem to have stalled the progress of the bill. It is Heil's opinion that the US DOT Pipeline & Hazardous Materials Safety Administration (PHMSA) will go forward with a rule making during the first half of 2010 instead of waiting for Congress to act on the bill. A rule making by PMHSA would have the same affect on the industry as Congress passing a law. We believe the rule making will copy the language of the bill in that it will forbid unprotected wet lines from carrying Class 3 flammable liquids and list compliance dates for both new and used equipment as follows:

- The rule, as it is written, forbids all tank trailers **manufactured on or after 2 years after the enactment of the rule** from carrying Class 3 flammable liquids in unprotected external piping.
- The rule forbids **all tank trailers** from carrying Class 3 flammable liquids in unprotected external piping on or after December 31, 2025.
- The rule excludes truck tanks with their external piping protected by the truck frame from the requirement.
- The rule provides the potential for a means of protecting wet lines on tank trailers, similar to the truck tank provision, but does not give any detail as to how extensive the protection must be.

Currently, there is one system completely designed and ready for installation. It is manufactured by Cargo Tank Concepts and is being used by Sunoco. Both Civacon and Betts are working on their own solutions, but neither is ready to go to market. Bayco and Betts currently offer emergency valves and APIs prepped for the Cargo Tank Concepts system.

It is likely that significant advances will be made in evacuation systems prior to or immediately after the rule making. Heil will be ready to prep for any manufacturer's system to meet the new requirements as the market dictates.

Contact your Heil Account Manager if you have any questions or need any further information.