

SCHNEIDER POSITION: ENSURE COMPLIANCE WITH TANKER ENDORSEMENT REQUIREMENTS TO MINIMIZE SUPPLY CHAIN DISRUPTIONS

BACKGROUND

Effective in all states as of July 8, 2015, shippers moving contained liquids in dry van trailers and intermodal containers must comply with tanker endorsement regulations.

The Federal Motor Carrier Safety Administration (FMCSA) redefined what is considered to be a tank in a 2011 rule and for the first time included capacity requirements. Under the rule, a tank is: 1) "Any commercial vehicle that is designed to transport any liquid or gaseous material within a tank or tanks having an individual rate capacity of more than 119 gallons," and 2) "An aggregated capacity of 1,000 gallons or more that is either permanently or temporarily attached to the vehicle or chassis." Tanks that are manifested either as being "Empty" or as "Residue Last Contained" on a bill of lading do not apply under the rule.

In addition to defining a tank, the tanker endorsement rule is designed to educate drivers about controlling the effects of surge inherent in transporting a large amount of liquid. Surge occurs when liquid changes position based on gravity or other momentum, such as when a vehicle accelerates or decelerates.

If a load meets these capacity and configuration requirements, it must be transported by a driver with a "tank endorsement" on his or her CDL. Moving a load without the proper endorsements could cause significant shipping delays if the driver is found in violation and placed out of service. This enforcement is driving the need to more aggressively work toward compliance and awareness.

1,000 GALLONS
AGGREGATED
CAPACITY



AVOID DELAYS
HAVE PROPER ENDORSEMENTS



WHAT ARE THE TANKER ENDORSEMENT REGULATIONS?

The official definition of a tank has led to confusion regarding which drivers are required to have a tanker endorsement on their CDLs. Issued by passing a tank knowledge test, the endorsement ensures a driver can react to those situations when there is a risk of surge and where there is a higher center of gravity. Drivers must acquire a tanker endorsement from the state that grants the CDL.

To help clarify which shipments require drivers to obtain a tanker endorsement and what quantity amounts apply, the FMCSA has issued regulatory guidance on the rule:

Types of drivers requiring a tanker endorsement

- Drivers transporting any liquids in tanks that are either permanently or temporarily attached to the vehicle or the chassis and exceed 1,000 gallons in total, or any liquid or gaseous material in a permanent tank that exceeds 1,000 gallons total
- Drivers hauling filled cylinders (containers used to haul industrial gas) or intermediate bulk containers (IBC), which are shipped in a van and exceed 1,000 gallons
- Drivers conveying multiple IBCs that are greater than 119-gallon capacity and have a total capacity of 1,000 gallons or more and that are strapped, chained or otherwise secured to a vehicle
- Less-than-truckload drivers carrying bulk liquids in greater than 119-gallon capacity and have a total capacity of 1,000 gallons or more

The conclusion: Air-ride suspension is not superior to spring ride. Not only are air-ride suspensions more expensive to purchase and maintain, which could translate to inflated expense to the shipper, but more importantly, they do not guarantee superior ride quality.

SCHNEIDER'S POSITION

Because the rule requires more drivers to secure a CDL tank vehicle endorsement, fewer current drivers can legally carry the containers, exacerbating the capacity crunch.

To overcome this hurdle, Schneider strongly encourages shippers to be aware and thoroughly understand the tank definition. When working with a carrier, shippers should fully disclose the type of freight that needs to be transported, how it is packaged and the freight's volume.

Shippers should also be aware that some carriers will not have the dry van fleet capacity to move these types of loads. In these situations, shippers should work with carriers like Schneider that can supply tanker endorsed drivers and that offer a broad portfolio of services, such as a dedicated fleet or intermodal service. Currently, 50 percent of Schneider's van truckload drivers are tanker endorsed.

For an illustrated guideline on whether your freight requires a tanker endorsed driver, [view our infographic](#).