

CDL- Hauling oil, Acetylene; 100 Mile Rule for Log Books

There were several questions raised at the District Meetings last November concerning Dorothy Water's presentation. We hope the following helps clear up those issues.

Question: Do I need a commercial drivers license to haul a 300 gallon tank of motor oil in a pickup truck?

Answer: Yes, because you have a placardable amount of a hazardous material being transported in "any type of vehicle"

- 1. A CDL is needed to drive any commercial motor vehicle. A pickup truck would qualify as a CMV if it was hauling a hazardous material in a placardable amount.**
- 2. According to Hazardous Materials Table in 49 CFR 172.101, motor oil is a class 3 flammable liquid.**
- 3. According to placarding requirements under 49 CFR 172.504, class 3 flammable liquids in bulk packaging require placards. Bulk packaging for liquids is anything over 119 gallons.**

In addition, the driver would need a hazardous materials endorsement on his or her license.

If you try to get around the bulk container issue by using several containers, you have to keep in mind that non-bulk containers holding an aggregate gross weight (all of them added together) of over 1001 "pounds" (not gallons) would also require placarding.

Question: Some DOT requirements, such as logbooks, are "exempted for intrastate travel and travel within a 100-air mile radius (as the crow flies) of my business. Does the 100-air mile radius still apply if I cross a state line?

Answer: Yes, you may claim any exemption allowed under the 100 air-mile radius as long as you stay within the 100 mile radius even if you cross state lines and are technically doing interstate business.

Question: Do I need to placard my truck that hauls around acetylene and oxygen for welding and cutting?

Answer: It depends on how much you are hauling and in what size containers. Acetylene and oxygen are both hazardous materials. They both fall into the category requiring placards if more than 1001 pounds of aggregate gross weight of hazardous materials is transported at one time (the contents of all the cylinders you are hauling combined). All bulk containers require placarding. The non-bulk cylinders (less than 119 gallons) you would carry do not require placarding for your truck as long as you don't exceed that 1001 pound limit.