



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

JUL 25 2016

Mr. Tom Sauta
Hydro-Test Products, Inc.
85 Hudson Road
Stow, MA 01775

Ref. No. 16-0050

Dear Mr. Sauta:

This responds to your March 15, 2016 letter requesting clarification of the cylinder requalification marking requirements under § 180.213 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you request clarification on the use of labels to satisfy the requirements in § 180.213. Your questions are paraphrased and answered as follows:

Q1. Are cylinder requalification markings permitted on the sidewall if the marking is done with a label?

A1. As provided by § 180.213(b)(1), requalification markings may be placed on any portion of the upper end of the cylinder excluding the sidewall.

Q2. Is it acceptable to use a label with the word "CONDEMNED" in lieu of stamping "CONDEMNED" for all cylinders?

A2. The use of a label with the word "CONDEMNED" is authorized only for composite cylinders (see § 180.205(i)(2)).

Q3. Is a label authorized to comply with the requalification marking requirements in § 180.213 for DOT 3HT cylinders?

A4. A label is not authorized for requalification markings on DOT 3HT cylinders (see § 180.213(c)(2)).

I hope this answers your inquiry. If you need additional assistance, please contact the Standards and Rulemaking Division at (202) 366-8553.

Sincerely,

Duane A. Pfund
International Standards Coordinator
Standards and Rulemaking Division

Leary
§180.213
Marking
16-0050

U.S. DOT
PHMSA Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

Re: Request for written letter of interpretation

Hydro-Test Products Inc. has been a leading supplier of compressed gas cylinder requalification equipment since 1972. We also provide cylinder re-qualifier training to meet CFR Title 49 §172.704 requirements.

In the Federal Register dated January 21, 2016, Vol. 81, No. 13, one of the regulation changes adopted, allows the use of labels on all cylinders to meet the re-qualification markings under §180.213. Questions on this new regulation are as follows:

- 1) §180.213(b) specifically states that “*Unless authorized by the cylinder specification, marking on the cylinder sidewall is prohibited*”. This ruling has been in effect for many years and was originally incorporated because metal stamping could noticeably weaken a cylinder if the stamp was hammered on the weakest (sidewall) part of the cylinder. With this new regulation now allowing the use of a label, there will be no weakening of the cylinder if the label is positioned on the sidewall.
Question: Is cylinder marking on the sidewall allowed if the marking is done with a label?
- 2) §180.205(i)(2)(i), states: “*When a cylinder must be condemned, the re-qualifier must stamp series of X’s over the DOT specification number and the marked service pressure ...*”
Question: Would it be acceptable to use a label with the word “CONDEMNED” imprinted in lieu of the stamping to meet this requirement on all cylinders?
- 3) §180.213(c)(2), specifically states that a low stress steel stamp be used on DOT3HT specification cylinders.
Question: Is a label now authorized for marking specification 3HT cylinders?

Thank you for your time and I look forward to your reply.

Best regards,

Tom Sauta

Tom Sauta
Hydro-Test Products Inc.



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