



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

APR 5 2004

400 Seventh St., S.W.
Washington, D.C. 20590

Mr. David L. Marciniak
Manager
ABCO Fire Protection, Inc.
1391 Frey Road
Pittsburgh, PA 15235

Reference No.: 03-0280

Dear Mr. Marciniak:

This responds to your letter requesting clarification of the requirements for requalification of cylinders under § 180.205 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the manufacturer's label on a fire extinguisher must be removed to perform a visual inspection of the cylinder surface.

Section 180.205(f)(2) requires removal of the coating or attachments prior to performing the visual inspection if the coating or attachments inhibit the visual inspection of a DOT specification or exemption cylinder. The requirements in § 180.205 do not apply to non-specification cylinders. To give us a better understanding of the extent that the label is covering the cylinder, we would appreciate receiving a photograph of the labeled cylinder.

I trust this satisfies your request.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards.



030280

§ 180.205 (f) (2)



ABC Fire Protection, Inc.
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Corbin
§180.205(f)(2)
Cylinders
03-0280

FAX TRANSMISSION

To: 202/366-3308

February 10, 2003

U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Safety - Exemptions and Approvals
400 7th Street, S.W.
Washington, DC 20590

Reference : RIN #A645

Gentlemen,

This is a request for clarification. In the discussion of CFR 49 Section 180.205 (f) (2), labels and coatings on cylinders being retested are discussed.

It is our understanding that labels must be removed to allow a thorough visual inspection of the cylinder surface. The language of DOT largely agrees with that of NFPA 10 Section 1.5.11 that discusses HMIS and other labeling.

Our specific question is ... Shall the original manufacturer's label be preserved?

It is our understanding that the UL/Factory Mutual marks and Serial Number, often contained on Amerex and General brand Fire Extinguisher labels must be preserved in order for the unit to remain listed for use.

Of course, where the original manufacturer's label is skinned or scraped, suggesting impact damage, the cylinder would be subject to test.

Please assist us in the interpretation of this matter. It appears to us that the original manufacturer's label, unavailable to any reseller, should not be summarily removed in most cases.

Sincerely,
DL Marciniak
David L. Marciniak
Manager

U.S. DOT/RSPA/OHME/EASTERN REGION
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