



U.S. Department  
of Transportation

Pipeline and Hazardous  
Materials Safety  
Administration

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

**NOV 19 2013**

Mr. Oberst Mulet  
HSB Global Standards  
One State Street  
P.O. Box 299  
Hartford, CT 53403-5011

Ref. No. 13-0176

Dear Mr. Mulet:

This responds to your August 22, 2013 email regarding physical testing of DOT Specification 4L cylinders under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You note that for most of the DOT Specification "300 series and 400" series cylinders, when physical testing of specimens is required, the specimen must conform to the following:

"A gauge length of 8 inches with a width not over 1½ inches, a gauge length of 2 inches with width not over 1½ inches, or a gauge length at least 24 times thickness with a width not over 6 times thickness (authorized when cylinder wall is not over  $\frac{3}{16}$  inch thick)."

You further note, however, that for physical testing of DOT Specification 4L cylinders under § 178.57(j)(2)(i), the criterion for the cylinder wall is "not over  $\frac{1}{16}$  inch thick." You ask whether this value is correct or whether it should read "not over  $\frac{3}{16}$  inch thick" consistent with the value for other DOT specification cylinders.

The criterion for the cylinder wall should read "not over  $\frac{3}{16}$  inch thick." Under rulemaking HM-220B (61 FR 25940; May 23, 1996), we restructured the cylinder specification requirements by consolidating repetitive requirements and implementing other formatting changes. In doing so, for a DOT Specification 4L cylinder, the cylinder wall thickness value was inadvertently changed to " $\frac{1}{16}$  inch." Prior to HM-220B, the value had been " $\frac{3}{16}$  inch" consistent with the other DOT specifications. We thank you for bringing this matter to our attention. PHMSA will revise this language in a future rulemaking.

I hope this information is helpful. If you have further questions, please contact this office.

Sincerely,

Robert Benedict  
Chief, Standards Development Branch  
Standards and Rulemaking Division

Der Kinderen  
§ 178.57(j)(2)(i)

**Drakeford, Carolyn (PHMSA)**

**From:** Betts, Charles (PHMSA)  
**Sent:** Friday, August 23, 2013 10:57 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Cc:** Cassidy, Duane (PHMSA)  
**Subject:** FW: 4BW Cylinder specification 178.57(j)(2)(i) Specimens dimensions for physical testing.

Cylinders  
13-0176

**Importance:** High

Carolyn-

Please log and assign to a specialist for handling.

Thanks,  
Charles

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**From:** Mulet Oberst - Hartford-HSBCT [[mailto:oberst\\_mulet@hsbct.com](mailto:oberst_mulet@hsbct.com)]  
**Sent:** Thursday, August 22, 2013 4:57 PM  
**To:** Cassidy, Duane (PHMSA)  
**Subject:** 4BW Cylinder specification 178.57(j)(2)(i) Specimens dimensions for physical testing.

Dear Mr. Cassidy:

I hope you are doing well. I have the following question concerning paragraph 178.57(j)(2)(i) of the 49 CFR Transportation.

For 300 series and 400 series cylinders specifications, when required, the conditions for obtaining a specimen from a cylinder or sphere for the required physical testing, one of the options among others is as follows:

"A gauge length of 8 inches with a width of not over 1-1/2 inches, a gauge length of 2 inches with a width of not over 1-1/2 inches, or a gauge length of at least 24 times the thickness with a width not over 6 times thickness is authorized when a cylinder wall is not over 3/16 inch thick."

While for 4L Cylinder Specifications the requirement reads:

178.57(j)(2)(i)

"A gauge length of 8 inches with a width not over 1-1/2 inches, a gauge length of 2 inches with width not over 1-1/2 inches, or a gauge length at least 24 times thickness with a width not over 6 times thickness (authorized when cylinder wall is not over 1/16 inch thick)."

My question is: For 4L cylinder specification is the one-sixteenth (1/16 ) inch the correct value and not three-sixteenth (3/16) inch?

I have searched the regulation and 4L is the only specification I found with this requirements and I thought it was possibly a mistake therefore I am requesting your corroboration. Thank you in advance.

Regards;

**Oberst Mulet**

Engineer II

HSB  Global Standards

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