



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

MAY 12 2014

Mr. Brett Schlueter
423 SCMS/GUEA
3001 Staff Dr. Ste. IAC1-100B
Tinker AFB, OK 73145

Ref No.: 14-0053

Dear Mr. Schlueter:

This is a response to your March 18, 2014 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) with regard to requalification markings on DOT specification cylinders and DOT Special Permit (DOT-SP) Cylinders used as fire extinguishers. Specifically, you request clarification on what specifications or types of cylinders may be marked using a pressure sensitive label.

In your email you indicate you are performing requalifications of DOT 4D, DOT 4DA, DOT 4DS, DOT-SP 7945, DOT-SP 7971, DOT-SP 8439, and DOT-SP 8495 cylinders that are used as fire extinguishers. Requirements for requalification markings for cylinders are found in § 180.213. In accordance with § 180.213(c)(1), cylinders used as fire extinguishers may be marked using a pressure sensitive label. This paragraph is not limited to DOT specification cylinders listed in § 180.209(j), but applies to all cylinders used as fire extinguishers.

I hope this information is helpful. If you have any more questions, please do not hesitate to contact this office.

Sincerely,

Robert Benedict
Chief, Standards Development
Standards and Rulemaking Division



DEPARTMENT OF THE AIR FORCE
848th SUPPLY CHAIN MANAGEMENT GROUP (AFMC)
TINKER AIR FORCE BASE OKLAHOMA

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§180.213(c)(1)
Cylinders
14-0053

18 March 2014

MEMORANDUM FOR: Office of the Administrator
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
East Building, 2nd Floor
Mail Stop: E27-300
1200 New Jersey Ave., SE
Washington, DC 20590

FROM: 423 SCMS/GUEA
3001 Staff Dr. Ste. 1AC1-100B
Tinker AFB, OK 73145-2713

SUBJECT: Request letter of interpretation regarding 49 CFR Section 180.213 (c)(1)

1. This request is for an official interpretation of Section 180.213 (c)(1) of 49 CFR which states, "A cylinder used as a fire extinguisher (180.209(j)) may be marked by using a pressure sensitive label." This request applies specifically to requalification markings for several DOT-specification cylinders currently being used as fire extinguishers for use onboard U.S. Air Force aircraft. The referenced DOT-specification cylinders are: 4D, 4DA, 4DS, Special Permits SP-5861, SP-7945, SP-7971, SP-8439, and SP-8495. Permission to use pressure sensitive labels in this application is required as many of these cylinders no longer have adequate space for requalification markings in the areas allowed to be stamped.
2. Following the references in the 49 CFR starting with Section 180.209(j) leads to Section 173.309, Fire Extinguishers, which lists DOT-specification cylinders by name. The cylinders listed above are not specifically named in Section 173.309 leading to some confusion as to the intent of Section 180.213 (c)(1). An initial request for interpretation made by phone to the HAZMAT Information Center hotline (1-800-467-4922) was answered by referencing a prior letter of interpretation (Reference No.: 05-0266). This letter appears to apply specifically to composite (fiber wrapped) cylinders, however, it may also be interpreted as allowing blanket approval for any DOT-specification cylinder being used as a fire extinguisher.
3. Please provide an official interpretation of Section 180.213 (c)(1) relating specifically to the DOT-specification cylinders listed above. May the requalification markings for these cylinders be marked by using a pressure sensitive label so long as they are being used as fire extinguishers?
4. If additional information is needed, please contact the Air Force engineering POC for this request, Brett Schlueter, 405-734-7733 or email brett.schlueter@us.af.mil.


MEL J. LOUTHAN, Flight Chief
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