



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

AUG 11 2003

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

Mr. George Plum  
USA Services, Inc.  
1111 Ingleside Road  
P. O. Box 12103  
Norfolk, VA 23502

Ref. No.: 03-0164

Dear Mr. Plum:

This responds to your letter regarding proof pressure test requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you asked whether the proof pressure test prescribed in §180.209(e) may be performed on certain DOT-4 series cylinders used for refrigerant gas recovery.

The answer is yes. A cylinder made in conformance with specification DOT 4B, 4BA, 4BW, or 4E that is protected externally by a suitable corrosion-resistant coating and used exclusively for the materials specified in §180.209(e), which include refrigerant gases, that are commercially free from corroding components may be requalified by volumetric expansion testing every 12 years instead of every five years. As an alternative, the cylinder may be subjected to a proof pressure test at least two times the marked service pressure, but this latter type of test must be repeated every seven years after expiration of the first 12-year period. When subjected to a proof pressure test, the cylinder must be carefully examined under test pressure and removed from service if a leak or defect is found.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

Susan Gorsky  
Senior Transportation Regulations Specialist  
Office of Hazardous Materials Standards



030164

180.209



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Engrum  
§ 180.209(e)  
Testing  
03-0164

VA (757) 855-2233  
(800) 727-2628  
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FAX TRANSMISSION:

TO: DHM-10 FAX NUMBER: 202 366 3012  
FIRM: DOT OFFICE OF HAZMAT STANDARDS DATE: 7-8-03  
FROM: GEORGE PLUM USA SERVICES, INC.

SUBJ: 49CFR 180.209 (e) PROOF PRESSURE TEST

PLEASE VERIFY THE FOLLOWING:

THE PROOF PRESSURE TEST CRITERIA FOR DOT  
4B, 4BA, 4BW OR 4E REFRIGERANT RECOVERY  
CYLINDERS IS THE SAME AS FOR REFRIGERANT  
CYLINDERS OF THE SAME SPECIFICATION.

SAID ANOTHER WAY, REFRIGERANT RECOVERY  
CYLINDERS CAN BE PROOF PRESSURE TESTED  
IN ACCORDANCE WITH 49CFR 180.209 (e).

PLEASE RESPOND TO THE ABOVE AS SOON AS  
POSSIBLE.

THANK YOU

*George Plum*