



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

MAP 18 2005

Mr. Randy Pettitt
Welding Specialist-Mechanical Engineering
Fike Corporation
704 South 10th Street
Blue Springs, Missouri 64013

Ref. No. 05-0009

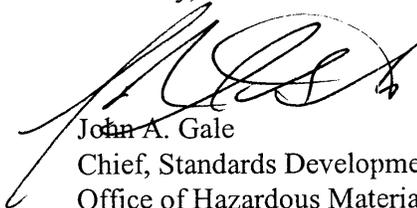
Dear Mr. Pettitt:

This responds to your letter and subsequent telephone conversation with Cheryl Freeman, Office Hazardous Materials Technology, concerning requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to authorized materials for construction of Specification 4BW cylinders. Specifically, you asked if you are correct that §178.61(b)(2) contains a typographical error as it pertains to the authorized material for Specification 4BW cylinder heads.

Authorized materials for construction of Specification 4BW cylinders are specified in § 178.61(b). Section 178.61(b)(1) authorizes the use of materials listed in Table 1 of Appendix A. Material for heads are prescribed in § 178.61(b)(2), in addition to the materials listed in Table 1 of Appendix A. Low carbon steel is an authorized material of construction. Low carbon steel is a steel with a carbon content typically 0.06% to 0.13%. You are correct that, as currently written, § 178.61(b)(2) references § 178.61(a), which applies to the type, size, and service pressure of specification 4BW cylinders and not the authorized material for heads. The reference should be § 178.61(b)(1). We will correct the authorized material requirements in a future rulemaking.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



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Web 6
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Cylinders
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CORPORATION

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January 10, 2005

Edward Mazzullo
Director, Office of Hazardous Materials Standards
400 7th Street SW, DHM-10
Washington, D.C. 20590

Dear Mr. Mazzullo:

This letter is to formally request clarification, in writing on DOT letterhead, of the material requirements for heads used in the manufacture of DOT 4BW cylinders (Ref. 49CFR 178.61). As per the attached E-mail communication between our company representative and Cheryl Freeman of the Office of Hazardous Material Technology, we understand the Department of Transportation's Interpretation, the use of the phrase "low carbon steel" in CFR 178.61 (b) (2) refers to a classification of steels (e.g., 1015, 1008, etc.) and does not refer to a specific carbon content that may occur in a steel such as a High Strength Low Allow (HSLA) steel. We further understand that it is not DOT's intention to mandate a strength penalty on HSLA steels that may have a carbon content below .15%, so long as all other applicable requirements are met.

Secondly, we understand that there is a typographical error in the current release of CFR 178.61 (b) (2). The DOT's intent is to allow steel for heads that either {conform to the limits specified in Table I of Appendix A to Part 178}, or {be open hearth, electric or basic oxygen carbon steel of uniform quality with a content percent not to exceed the following: Carbon 0.25, Manganese 0.60, Phosphorus 0.045, Sulfur 0.050.}. The content percent requirements of the latter do not apply to the Table I Appendix A requirements.

Sincerely,

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