



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

JAN 13 2014

Mr. Patrick Miller
Chief Inspector
T-Aerospace, LLC
4048 Senator Street
Memphis, TN 38118

Reference No. 13-0190

Dear Mr. Miller:

This is in response to your September 19, 2013 e-mail asking for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) pertaining to chemical fire extinguishers. In your e-mail, you state these fire extinguishers weigh 13 pounds (5.90 kg) each, contain liquefied bromochlorodifluoromethane gas (Halon 1211), and are composed of non-specification cylinders constructed in conformance with United Laboratories (UL) Standard 299 (Dry chemical fire extinguishers). We apologize for the delay in responding and any inconvenience this may have caused.

As an attachment to your e-mail, you included two pictures of the Amerex Model B371 fire extinguisher: one of the specification plate, the second, of the instructions. These pictures indicate that the cylinders are Classification 2-1:40-B:C, Size II, cylinders pressure-tested to 585 psi (4035 kPa). Further, the specification plate also states that the fire extinguisher conforms to two test standards: American National Standards Institute, Inc. (ANSI)/UL 711 (Rating and fire testing of fire extinguishers), and ANSI/UL 1093 (Halogenated agent fire extinguishers). You ask if your company needs a requalifier identification number (RIN) to service and re-certify dry chemical fire extinguishers manufactured by the Ansul and Amerex Corporations under the HMR.

The answer to your question is no. The HMR require those persons who requalify (i.e., inspect, test, or certify), rebuild, or repair a Department of Transportation (DOT) specification cylinder or United Nations (UN) standard pressure receptacle to be approved to perform these tasks through receipt of a RIN. The Pipeline and Hazardous Materials Safety Administration's (PHMSA's) Associate Administrator for Hazardous Materials Safety issues RINs to qualified persons in conformance with §§ 107.801, 180.201, and 180.203 of

the HMR. The HMR do not require facilities that test non-specification fire extinguishers to have a PHMSA-issued RIN. Nevertheless, non-specification fire extinguishers are only authorized under the HMR if they meet all conditions and testing requirements prescribed in § 173.309(c).

I hope this satisfies your request. Please contact us if you need further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Glenn Foster", with a long horizontal flourish extending to the right.

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Drakeford, Carolyn (PHMSA)

Edmonson,
§173.309(c).
Fire Extinguishers

From: Edmonson, Eileen (PHMSA)
Sent: Friday, September 20, 2013 12:01 PM
To: Drakeford, Carolyn (PHMSA)
Subject: Request for Clarification for § 173.309(c)
Attachments: photo.jpg; photo.jpg

13-0190

Carolyn –

Please log in the e-mails below and attached photos as one letter from Patrick Miller and assign it to me.

Thanks,

Eileen Edmonson
USDOT/PHMSA
(202) 366-4481 (w)
(202) 366-7041 (f)
eileen.edmonson@dot.gov (e-mail)
<http://www.phmsa.dot.gov/hazmat> (website)
infocntr@dot.gov (Hazmat Info Center E-mail)

From: Patrick Miller [<mailto:pmiller@taerospace.com>]
Sent: Thursday, September 19, 2013 8:41 AM
To: Edmonson, Eileen (PHMSA)
Subject: DOT RIN

Hi Eileen,

I am still trying to figure out if we need to have a RIN number. We are picking up these fire extinguishers by company truck and bringing them back to our shop and returning them the same way. We will service these extinguishers here (which will include a hydrostatic test if needed). Both of the manufactures (ANSUL and AMEREX) of these fire extinguishers have said these cylinders are Non-Specification Cylinders which comply to the UL 299 designed cylinders and do not fall under the DOT requirements. Could there be another reason why we would need a RIN number to certify these cylinders.

Thanks for your help again,

Patrick Miller
Chief Inspector
T-Aerospace LLC
4048 Senator Street
Memphis, TN 38118
901-367-8944
pmiller@taerospace.com

From: Patrick Miller [<mailto:pmiller@taerospace.com>]
Sent: Friday, September 13, 2013 8:36 AM
To: Edmonson, Eileen (PHMSA)
Subject: RE: Halon 1211 Fire Extinguishers

Eileen,
Forgot to attach the pictures.
Patrick

From: Patrick Miller [<mailto:pmiller@taerospace.com>]

Sent: Friday, September 13, 2013 8:34 AM

To: Edmonson, Eileen (PHMSA)

Subject: RE: Halon 1211 Fire Extinguishers

Eileen,

Thank you for the links that you sent me. Can you forward these pictures to Mark Toughiry for me? This cylinder in these two pictures shows to be a 2A cylinder. The markings on the cylinder bottom are 40 BAR, 07, and AX. I do not see anything else stamped on the cylinder. In the Cylinder Maintenance and Testing requirements for high and low pressure cylinders (Retest and Inspection of cylinders Table), it does not show anything about a 1A or 2A cylinder. Is there some where else I can find information about these cylinders?

Thank you for the help,

Patrick Miller

Chief Inspector

T-Aerospace LLC

4048 Senator Street

Memphis, TN 38118

901-367-8944

pmiller@taerospace.com

From: eileen.edmonson@dot.gov [<mailto:eileen.edmonson@dot.gov>]

Sent: Thursday, September 12, 2013 4:26 PM

To: Patrick Miller

Subject: RE: Halon 1211 Fire Extinguishers

Hello Patrick,

I have enclosed the following website links in response to your request during our telephone conversation this afternoon on Halon 1211 fire extinguishers.

49 CFR 173.309

<http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=5622380de2cb5316d73f377da1c5a821&rgn=div8&view=text&node=49:2.1.1.3.9.7.25.16&idno=49>

49 CFR 180.213

<http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=0bcb0d1053f9cdb26d6968b8183ee558&rgn=div8&view=text&node=49:3.1.1.1.3.3.1.9&idno=49>

Hazardous Materials: Harmonization With the United Nations Recommendations, International Maritime Dangerous Goods Code, and the International Civil Aviation Organization Technical Instructions for the Safe Transport of Dangerous Goods by Air; Final Rule, Docket No. **PHMSA-2009-0126** (HM-215K)

01/07/2013 Final Rule (contains latest version of § 173.309)

<http://www.gpo.gov/fdsys/pkg/FR-2013-01-07/pdf/2012-31242.pdf>

Hazardous Materials Regulations

49 CFR Parts 171-177

http://www.ecfr.gov/cgi-bin/text-idx?sid=e213d7b2c72a1202be4d100c360a66b5&c=ecfr&tpl=/ecfrbrowse/Title49/49cfrv2_02.tpl

49 CFR Parts 178-180

http://www.ecfr.gov/cgi-bin/text-idx?sid=453007b18b06b741266094d4e62470b9&c=ecfr&tpl=/ecfrbrowse/Title49/49cfrv3_02.tpl

I hope this satisfies your request.

Sincerely,

Eileen Edmonson

USDOT/PHMSA

202-366-4481 (w)

202-366-7041 (fax)

eileen.edmonson@dot.gov (e-mail)

www.phmsa.dot.gov/hazmat/regulations

www.dot.gov

...LY OR AT MORE
...MSTANCES REQUIRE.
...RE UNOBSTRUCTED.
...OPERABLE RANGE.
...BE IN PLACE. GROSS
...ED EXTINGUISHER
...1 LB 3 OZ ± 14 OZ
...GROSS WEIGHT OF
...G WHEN INITIALLY
...OSS WEIGHT OF
... THAN 10 OZ (.28 KG)

...LY AFTER ANY USE.
...TINGUISHER TO LEAK.
...TH 13 LB (5.90 KG) OF
...MBER 12143 AND
...PSI (1345 kPa) BY AN
...R (RECHARGER) IN
...NO. 05804.
...AINED, AND TESTED
...S MANUAL SUPPLIED
...NATIONAL FIRE
...D NO. 10, PORTABLE

AMEREX CORP.
MOBILE, AL 36173
(205) 655-2271



LISTED

LIQUEFIED GAS TYPE FIRE EXTINGUISHER
CLASSIFICATION 2-A:40-B:C
TESTED TO ANS/UL 711 AND ANS/UL 1093
MARINE TYPE USCG

TYPE B:C SIZE II
APPROVAL NO. 162.028/EX 2993
VALID ONLY WITH BRACKET 809

NO. X-442425



13 LB (5.90 KG) HALON 1211
(BROMOCHLORODIFLUOROMETHANE)
SUITABLE FOR USE AT TEMPERATURES
FROM -65°F TO 120°F (-54°C TO 49°C)

MEETS DOT REQUIREMENTS
PRESSURE TESTED TO 585 PSI (4035 kPa)



AMEREX MODEL
B371
MADE IN U.S.A.



APPROVED



16034

INSTRUCTIONS

- ① HOLD UPRIGHT, PULL RING PIN.
 PULL
- ② START BACK 10 FEET, AIM AT BASE OF FIRE.
 POINT
- ③ SQUEEZE LEVER.
 PRESS
- ④ SWEEP SIDE TO SIDE.
 SWEEP

- ▲ TRASH-PAPER
- ⚠ LIGHTS
- ⚡ ELECTRICAL EQUIPMENT

WARNING: THE CONCENTRATED AGENT WHEN APPLIED TO FIRE CAN PRODUCE TOXIC BY-PRODUCTS. AVOID INHALATION OF THESE MATERIALS BY EVACUATING AND VENTILATING THE AREA. DO NOT USE IN CONFINED SPACES OR LESS THAN 1022 CUBIC FEET PER EXTINGUISHER.





Amerex Corporation

RUGGED

- 1 Year Manufacturer's Warranty
- Stored Pressure Design
- Dependable Drawn Steel Cylinders
- Durable High Gloss Polyester Powder Paint
- All Metal Valve Construction
- Temperature Range -40°F to 120°F

CLEAN

- Leaves no residue
- Reclaimed Halon 1211 is Restored to Original Military Specification
- Uses All Recycled Gas in Accordance With The Montreal Protocol

USER FRIENDLY

- Maximum Visibility During Discharge
- Large Loop Pull Pin
- No Electrical Conductivity Back to the Operator
- No Thermal or Static Shock
- Bar Coded and Bi-lingual Labels

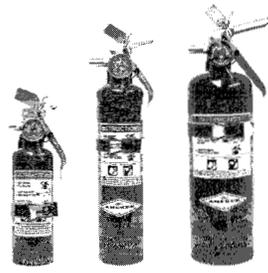
OPTION

- USCG Approved with Bracket Listed on UL Label (except model A344T)

HALON 1211 is a liquified gas, pressurized with nitrogen, which discharges as a vapor causing no cold or static shock and no impairment of the operator's vision. This "CLEAN" agent quickly penetrates difficult to see and hard to reach areas and leaves no residue. It is recommended for protection of delicate, sensitive and expensive computers, electrical equipment, tapes and film, automotive and aircraft engines, laboratory chemicals and equipment.

Quality industrial grade hardware, "CLEAN" agent, light weight, good discharge range and excellent fire extinguishing ability.

Aluminum Valve
A344T
C352TS
B355T



C354TS

Brass Valve
B369
B371
361



Recycled gaseous agent certified to meet military specifications

AGENT TYPE	HALON 1211						
	ANODIZED ALUMINUM			CHROME PLATED BRASS			
VALVE TYPE							
DESIGN	NOZZLE		HOSE	NOZZLE		HOSE	
MODEL NUMBER	A344T	* C352TS	* C354TS	B355T	B369	B371	361
UL & ULC RATING	2B:C	5B:C	5B:C	10B:C	1A:10B:C	2A:40B:C	4A:80B:C
CAPACITY (LBS.)	1.25	2.5	3	5	9	13	17
SHIPPING WT. (LBS.)	2.75	5.5	6	9.75	16.75	22	36.25
HEIGHT (IN.)	10	14.38	14.38	15.25	16.25	20.25	24
WIDTH (IN.)	3.63	4.5	6	5.75	8.5	8.5	9.75
DEPTH (IN.)	2.63	3	3	4.25	5	5	7
RANGE (INITIAL- FT)	9-12	9-15	9-15	9-15	12-18	12-18	12-18
DISCHARGE TIME (SEC.)	10	10	12	10	9	14	22
OPTIONAL CHROME CYLINDER	YES	YES	YES	YES	YES	YES	
MINIMUM SPACE REQUIREMENTS (CU. FT.)	156	312	375	624	1123	1622	2120
INCLUDED BRACKET	VEHICLE	AIRCRAFT	AIRCRAFT	VEHICLE	WALL	WALL	WALL

* SPECIAL VALVE DESIGN FOR AIRCRAFT INSTALLATIONS

Manufactured and Tested to
ANSI/UL Standards
Complies with NFPA 10 Standard
ISO-9001/ ISO-14001 Certified
UL LISTED

CONFORMS TO TEST STANDARDS:

UL-1093 - ANSI/UL711

MADE IN U.S.A.

HALON 1211