



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

APR 16 2019

Myles L. TenBroeck  
President  
American Cylinder and Safety  
P.O. Box 126  
Iowa Park, TX 76367

Reference No. 18-0143

Dear Mr. TenBroeck:

This letter is in response to your November 20, 2018, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to epoxy labels used to mark cylinders. Specifically, you provide the following scenario and ask whether the label embedded in epoxy can be reapplied to the cylinder:

- A DOT specification 3A, 3AA, or 3AL cylinder is successfully requalified in accordance with the HMR.
- A label embedded in epoxy is placed on the cylinder to mark that it passed requalification (per § 180.213(c)).
- During the requalification period, the label embedded in epoxy falls off due to corrosion on the cylinder and because the surface was not properly prepared prior to being marked.

As detailed in your request, § 180.213(c) authorizes a variety of marking methods following the successful requalification of a cylinder. These methods include applying a label embedded in epoxy that will remain legible and durable throughout the life of the cylinder. If the label does not meet this condition because it falls off during the requalification period, it is the opinion of this Office that the label may be replaced if the original requalifier can verify and ensure that the specific cylinder in question successfully passed requalification. One method of verification would be to match the manufacturer and serial number on the cylinder to the manufacturer and serial number in the requalification test records for the most recent test. If unable to be verified, the cylinder will need to pass the appropriate requalification tests. A new label embedded in epoxy or other marking method that meets the requirements of § 180.213(c) will need to be applied.

Please note that if a cylinder shows evidence of dents, corrosion, cracked or abraded areas, leakage, thermal damage, or any other condition that might render it unsafe for use in transportation, it must be tested and inspected without regard to any other periodic requalification in accordance with § 180.205(d). Furthermore, as detailed in § 180.205(f)(1),

when a cylinder is pressure tested, the visual inspection must be performed in accordance with the appropriate CGA pamphlet, including inspection of any corrosion.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Dirk Der Kinderen', written in a cursive style.

Dirk Der Kinderen  
Chief, Standards Development  
Standards and Rulemaking Division

Geller  
18-0143

## January, Ikeya CTR (PHMSA)

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**From:** INFOCNTR (PHMSA)  
**Sent:** Wednesday, November 21, 2018 4:33 PM  
**To:** Hazmat Interps  
**Subject:** FW: Request for a Letter of Interpretation

Hello Alice and Ikeya,

Below is a request for letter of interpretation. We checked for other letters but did not find anything that pertained to his question exactly.

Thanks,

Lynsie

**Lynsie Patschke**

*Transportation Regulatory Specialist*

Hazardous Materials Information Center (HMIC)

Pipeline and Hazardous Materials Safety Administration

202.366.4488

[lynsie.patschke.ctr@dot.gov](mailto:lynsie.patschke.ctr@dot.gov)

**From:** Myles TenBroeck [mailto:tanktest@gmail.com]  
**Sent:** Tuesday, November 20, 2018 3:39 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request for a Letter of Interpretation

Good afternoon,

I am requesting clarification and a letter of interpretation in regards to the use of epoxy coated labels to mark the successful requalification of solid wall 3A, 3AA and 3AL cylinders.

In CFR Title 49 dated October 1, 2016 (and following editions) one of the regulation changes allows the use of labels on all cylinders to meet the requalification markings under § 180.213. Questions on this new regulation are as follows:

1) § 180.213 specifically allows the use of a label instead of stamped markings on solid wall cylinders. If corrosion is present, and the surface is not properly prepared, the label and epoxy coating may not effectively bond resulting in this label falling off at a future point.

**Question 1:** If a label and epoxy coating fail to properly adhere resulting in this label falling off, does the cylinder now require an additional requalification test to apply a new label?

**Question 2:** If the label falls off within the current requalification period, can the original facility that applied the label, apply a replacement label to the cylinder utilizing the original test date by comparing the cylinder with test records to ensure it is the same cylinder?

Thank you for your time and I look forward to your reply.

V/R

Myles L. TenBroeck  
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HAZMAT Training and Equipment for members of the compressed gas industry.