



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

OCT 15 2019

Oberst Mulet
CT Engineer II
The Hartford Steam Boiler Inspection and Insurance Co.
1 State Street
P.O. Box 5024
Hartford, CT 06102-5024

Reference No. 19-0051

Dear Mr. Mulet:

This letter is in response to your April 16, 2019, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to DOT 3AL seamless aluminum cylinders. Specifically, you ask whether the words "significant change" as used in § 178.46(c)(6) means an increase or decrease of the given criteria or just an increase in water capacity or base thickness, or the number of openings.

Section 178.46(c)(6) defines "significant change" applicable to DOT 3AL seamless aluminum cylinders as a 10% or greater change in cylinder wall thickness, service pressure, or diameter; a 30% or greater change in water capacity or base thickness; any change in material; over 100% increase in size of openings; or any change in the number of openings. The word "change" in the above paragraph means either an increase or decrease, meaning a "30% or greater change in water capacity" could be a 30% increase or a 30% decrease. Any of the above conditions would result in the change being considered significant for the purposes of § 178.46(c)(6).

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

Sincerely,

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

Wolcott

19-015

Dodd, Alice (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Wednesday, April 17, 2019 5:04 PM
To: Hazmat Interps
Subject: FW: Significant change clause

Hello Alice and Ikeya,

Below is a request for interpretation from Mulet Oberst.

Thanks,

Jonathon, HMIC

From: Mulet Oberst - Hartford-HSB [mailto:Oberst_Mulet@hsb.com]
Sent: Tuesday, April 16, 2019 4:51 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Significant change clause

To: The Office of Hazardous Materials Standards;

I have the following inquiry regarding 178.46(c)(6) "significant change":

Background:

In paragraph 178.46(c) of the 49 CFR, the word ***change*** instead of the words ***increased*** or ***decreased*** is used in two places as shown below in bold italics when compared to Clause 4.14.1 of CSA B339-18.

49 CFR - 178.46(c)(6)	B339-18, Clause 4.14.1
"...a 30 percent or greater <i>change</i> in water capacity or base thickness"	l) the water capacity is <i>increased</i> by 30% or more.
"...or a <i>change</i> in the number of openings.	f) the number of openings in the finished container is <i>increased</i> .

Question: In 49 CFR, paragraph 178.46(c)(6), does the word "***change***" means either an increase or decrease of the given criteria in which exceeding such upper or lower criteria of the water capacity, or base thickness, or number of openings would constitute a significant change to an acceptable design requiring qualification by prototype testing?

Best regards;

Oberst Mulet
CT-Engineer II

The Hartford Steam Boiler Inspection and Insurance Co.

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