



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

October 21, 2021

Mr. Bradley Bedard
VP Supply Chain Management
OMG Inc.
153 Bowles Road
Agawam, MA 01001

Reference No. 21-0086

Dear Mr. Bedard:

This letter is in response to your August 19, 2021, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to cylinder marking requirements. In your email, you included photographs depicting a Department of Transportation (DOT) specification 39 (DOT-39) cylinder that is marked with a space between the “M” and the numerals instead of before the “M.” You ask whether the additional space is a violation of the HMR.

Section 178.65(i)(2)(v) specifies that a DOT-39 cylinder must be marked with the registration number (M****) of the manufacturer. The addition of the space between the “M” and the numerals is not a violation of § 178.65(i). However, the markings as depicted in your photograph may frustrate the transportation of the cylinders.

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

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster".

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

From: INFOCNR (PHMSA)
To: Dodd, Alice (PHMSA)
Cc: Hazmat Interps
Subject: FW: Letter of Interpretation Request M0808
Date: Friday, August 20, 2021 5:06:14 PM
Attachments: image001.png
 image002.png

Hi Alice,

Please see the below Letter of Interpretation request.

Let us know if you need anything else.

Regards,

-Breanna

From: Bradley Bedard <bbedard@omginc.com>
Sent: Thursday, August 19, 2021 3:59 PM
To: INFOCNR (PHMSA) <INFOCNR.INFOCNR@dot.gov>
Subject: Letter of Interpretation Request M0808

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I spoke with a person in the DOT department, and they suggested that I send an email this email address.

I wanted to confirm that the nomenclature used by this China supplier for the DOT-39NCR is appropriate. As you can see, I've included a picture below (white is the China supplier). The red canister is from our domestic supplier and the spacing is a little different (before and after the M) I've also included an excerpt from the approved Foreign supplier list on your website below.

Can you please confirm that this is acceptable?

Please call if you have any questions.

I work for OMG Inc. at 153 Bowles Road, Agawam MA 01001 and my cell number is 413-896-1333

Thank you for your help with this matter.

M #	Manufacturer	Address	CA or Tracking Number	Independent Inspection Agency	Specification	Former Name	Status	Expiration Date
M0806	Zhejiang Ansheng Mechanical Manufacture Co. Ltd.	No. 811 Jinsha Street, Linjiang Industrial Park, Wuchengarea Jinhua City, Zhejiang Province, China	CA2008090021	Authorized Testing, Inc.	DOT-39		Good Standing	7/5/2022
M0807	Shanghai Tianhai Composite Cylinder Co., Ltd.	No. 2058 Laiyin Road, High -Tech Park, Jiuting Town, Songjiang District, Shanghai, China 201615	CA2008090017	Arrowhead Industrial Services	DOT-SP 14621		Good Standing	2/10/2022
M0808	Sanjiang Kaiyuan Co. Ltd.	No. 899 Yingbin Avenue Lanxi City, Zhejiang Province China	CA2008100012	Authorized Testing, Inc.	DOT-39		Good Standing	4/14/2024
M0809	Bhiwadi Cylinder Pvt. Ltd.	E-925, 1200 & 1201, Industrial area Phase III, Bhiwadi, Rajasthan, India	CA2008090020	Bureau Veritas (India) Private Limited	DOT-39		Good Standing	3/21/2024
	Kuanchenn Tianhai Pressure Container	West Mountain Root, Xiao Longxumen Village, Long Xumen Town, Kuancheng	CA200809002	Arrowhead Industrial Services	DOT-3AA II IN ISO 9800-1	Beijing Tianhai		

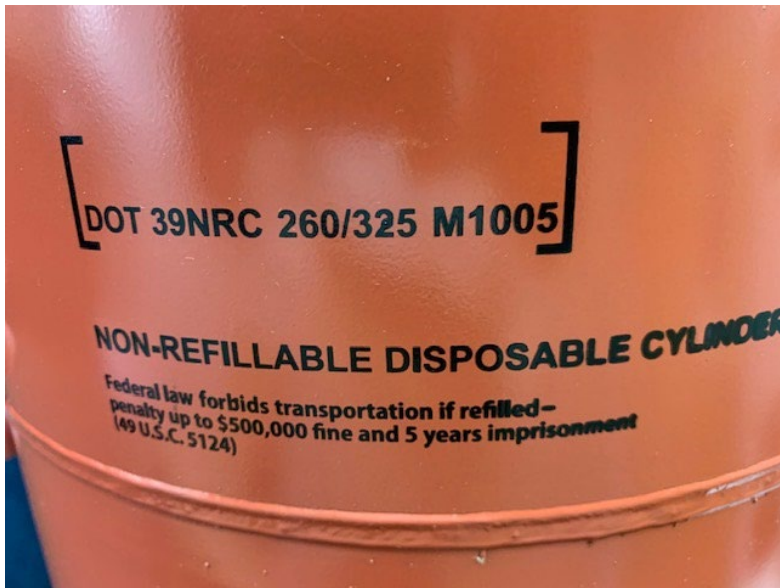
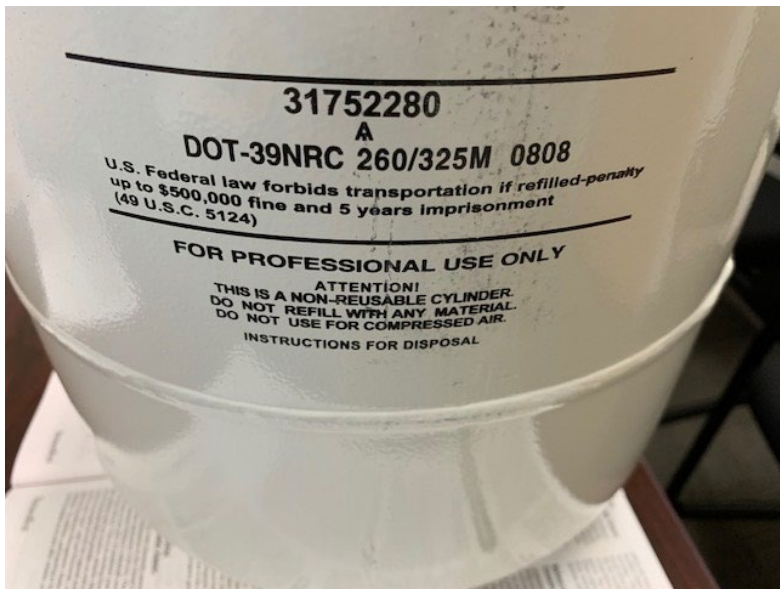


Brad Bedard
 VP Supply Chain Management
 p. 413.789.0252 x1127



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From: Bradley Bedard <bbedard@omginc.com>
Sent: Thursday, August 19, 2021 3:42 PM
To: Bradley Bedard <bbedard@omginc.com>
Subject:



Sent from my iPhone