Wolcott

21-0069

From: INFOCNTR (PHMSA)
To: Dodd, Alice (PHMSA); Hazmat Interps
Subject: FW: Interpretation Request for 49 CFR 173.309(c)
Date: Thursday, July 1, 2021 12:29:09 PM

Good afternoon Alice,

Please see the request for interpretation below. Please contact our office with any questions.

Thank you,

Sarah (HMIC)

From: Shugarman, Blake M. <Blake.M.Shugarman@ul.com>
Sent: Wednesday, June 30, 2021 12:18 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Interpretation Request for 49 CFR 173.309(c)

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Good day-

I'm responsible for writing new requirements, such as UL 2166P (select digital view to create an account), for products for safety toward Certification by UL.

I have a question regarding the following information for fire extinguishers installed as part of a fire suppression system and would like an interpretation.

With reference to 49 CFR 173.309(c), can plastic pipe with fitting assemblies with fusion or mechanical joints be utilized as non-specification cylinders provided compliance with 49 CFR 173.309(c) is maintained?

Should you have any questions or comments, please contact me.

Very truly yours,

--
Blake M. Shugarman (he, him, his)
Principal Engineer - Circuit Integrity Systems, Fire Extinguishers, Foam & Equipment, Special Hazard Fire Suppression
Distinguished Member of Technical Staff

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