U.S. Department
of Transportation

Research and
Special Programs
Administration

DEC 15 1999

400 Seventh Street, S.W.
Washington, D.C. 20590

Mr. Joseph A. Lane
Director Technical Services
Amtrol Inc.
1400 Division Road
West Warwick, RI 02893-2300

Ref. No. 99-0243

Dear Mr. Lane:

This is in response to your letter dated August 27, 1999,
requesting clarification on the periodic qualification of DOT 4BA
cylinders used exclusively for refrigerant gases which are
commercially free of corroding components. Specifically, you
state that the cylinders were marked with a 5-year retest due
date at the time of manufacture. You asked whether this 5-year
due date may be removed and replaced with a 10-year due date.

The HMR contains no requirement to mark a DOT specification
cylinder with the next due date. Therefore, the due date
marking, which would be considered as additional information
under § 173.34(c)(1), may be removed. Please note that the retest
date marked on a cylinder is the date (month and year) the test is
actually performed. See § 173.34(e)(1) and (7).

I hope this information is helpful. If we can be of further
assistance, please contact us.

Sincerely,

Hattie L. Mitchell, Chief
Regulatory Review and Reinvention
Office of Hazardous Materials Standards

990243

173.34

Mr. Edward Mazzulo
Hazardous Materials
US Dept. of Transportation
DHM-10
400th 7thSW Street
Washington, DC 20590

RE: ICI request on markings

Dear Mr. Mazzulo,

Amtrol manufactured 45, 4BAM cylinders and erred in marking the retest date at 5 years. These cylinders are used for virgin refrigerants and equipped with a Neriki valve to prevent refilling in the field.(See attached letter)

ICI desires to have these cylinders retested after 10 years according to the regulations since the product being used is non corrosive. Can the 5-year marking be removed and remarked for 10 years by ICI. The marking is on the handle that will not effect the structural integrity of the cylinder.

Thank you for your assistance.

Very truly yours

Joseph A. Lane
Director Technical Services

8/27/99