



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAR 17 2000

Ms. Robin J. Eddy
Safety and Regulatory Compliance Manager
Allied Universal Corp.
8350 N.W. 93 Street
Miami, Florida 33166-2098

Ref. No. 00-0066

Dear Ms. Eddy:

This is in response to your letter of February 24, 1999, requesting clarification of the retest and marking requirements for DOT specification 106A500X multi-unit tank car tanks under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

- (Q1) Must a testing facility possess a valid retester identification number (RIN) to perform retesting under § 180.519?
- (A1) No. RIN numbers are only assigned to authorized cylinder requalifiers.
- (Q2) Is a retester prohibited from stamping his RIN number on a multi-unit tank car tank that successfully completes the required pressure test?
- (A2) No, the HMR do not prohibit the placement of a RIN number on a tank car, nor is it required.
- (Q3) Multi-unit tank car tanks are required to be marked with the month and year of test, plainly and permanently stamped into the metal of one head or chime of each tank with successful test results. Based on a tank pressure retest interval of five years, if a tank is marked with the month and year 1/96, when is the retest due?
- (A3) As specified in § 180.519(a), a retest may be made at any time during the calendar year the retest falls due. Therefore, in your scenario, the retest may be conducted by December 31, 2001.



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I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Hattie L. Mitchell". The signature is written in black ink and is positioned below the word "Sincerely,".

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



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February 24, 2000

Mr. Edward Mazzulo
U.S. D.O.T./RSPA
400 Seventh Street, S.W.
Washington, D.C. 20590

VIA FACSIMILE: 202-366-3012

Re: Multi-Unit Tank Car Tanks, DOT Specification 106A500X

Dear Mr. Mazzulo:

During a Chlorine Institute seminar in Charlotte, North Carolina, Cheryl K. Johnson, Hazardous Materials Enforcement Specialist, gave a presentation to all attendees on the DOT regulatory requirements for 3A, 3AA cylinders and 106A500X multi-unit tank car tanks (commonly referred to in the gas industry as ton containers). Ms. Johnson noted that upon successful completion of hydrostatic testing for ton containers, DOT specification 106A500X, the container is to be marked with the month and year of the test. The container is not to be marked with a Retester Identification Number (RIN). Please clarify the following:

1. A testing facility is not required to have a RIN Number to test 106A500X tanks?
2. If a testing facility legally owns a RIN Number, and that testing facility retests 106A500X tanks, is it illegal for the test facility to stamp their RIN Number on a multi-unit tank car tank that successfully passes a hydrostatic test?

One question was asked during the presentation that Ms. Johnson was unable to answer.

3. Ton containers have the month and year of the hydrostatic test stamped on the chime of the container. If a container successfully passed a hydrostatic test in 1-96, when must a retest for the container be completed in order to continue use of the container? January 31st, 2001 or December 31st 2001? Is it the year of expiration for the ton container or the month and year of expiration that determine when the hydrostatic test is due?

There is much confusion within the industry regarding these three questions. Therefore, I am asking for a documented emergency clarification. The Chlorine Institute has an annual meeting in Houston, Texas starting March 19th. As a member of the regulatory subcommittee for packaging operations, I would like to have these three issues clarified prior to the meeting.

If you have any questions, please contact me at 800-981-6700, extension 183.

Thank you.

Sincerely,

Robin J. Eddy
Allied Universal Corporation
Safety & Regulatory Compliance Manager