



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

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

SEP 25 2001

Mr. Roger Ponder  
Western Sales & Testing of Deer Park, Inc.  
P.O. Box 860  
Deer Park, Texas 77536-0860

Reference No.: 01-0144

Dear Mr. Ponder:

This is in response to your June 1, 2001 letter concerning the periodic requalification requirements in 49 CFR 173.34(e). You asked whether a DOT Specification 3AA cylinder manufactured in 1955 that has been hydrostatically tested and exceeds the elastic expansion rejection limit listed in CGA Pamphlet C-5 can continue to be marked with a "star" marking and tested at 10 year intervals.

The answer is yes, if the cylinder meets the requirements of § 173.34(e)(16) and the other requalification requirements of § 173.34 such as the maximum allowed permanent expansion.

I hope this information is helpful.

Sincerely,



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



010144

17334(e)

# WESTERN SALES & TESTING OF DEER PARK, INC.

Betts  
§173.34(e)(16)  
Cylinder

• CYLINDER/VALVE SALES • HYDROSTATIC TESTING • ABRASIVE BLASTING • INDUSTRIAL SPRAY COATINGS  
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June 1, 2001

01-0144

Office of Hazardous Material Standards  
400 7<sup>th</sup> Street SW  
Washington, D.C. 20590

Dear Sir:

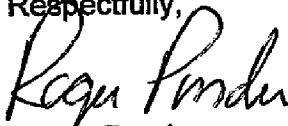
Recently a question was asked by a customer of mine and answered by the enforcement division of DOT. I would appreciate your interpretation of this issue in the form of a written response.

The question comes from CFR 49, Section 173.34(e)(16)

A 3AA2015 cylinder, 9" X 51", made in 1955 is hydrostatically tested. The results of the test show that the elastic expansion of the cylinder exceeds the elastic expansion rejection limit listed in CGA Pamphlet C-5. The cylinder has been used exclusively in one of the services listed in 173.34(e)(16)(B). Can the cylinder continue to be marked with a "star" marking and tested at 10 year intervals?

Your quickest response would be greatly appreciated.

Respectfully,



Roger Ponder  
Manager

Yes  
based on  
the wording  
of the  
provision,  
we may  
opinion  
that this  
is a future  
re-evaluation