



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

OCT 26 2004

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

Ms. Kathy McKenzie  
Safety and Compliance Director  
Western International Gas & Cylinder, INC.  
P.O. Box 668  
7173 Highway 159E  
Bellville, TX 77418

Ref. No.: 04-0045

Dear Ms. McKenzie:

This is in response to your February 25, 2004 letter requesting clarification regarding the requalification marking requirements for specification cylinders under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if your requalification markings may be smaller than the size requirements specified under § 180.213(e). Please accept my apology for our delay in responding to your letter.

Section 180.213(d) (1) allows modification of requalification marking requirements (e.g., smaller marking size) under the conditions of an approval. The procedure for applying for an approval is specified in § 107.705. There are other options that you may want to consider. One option would be to attach a metal plate with the applicable requalification markings. Another option would be to remove the older requalification markings to create space for the new requalification markings.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

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



040045

180.213



**WESTERN INTERNATIONAL GAS & CYLINDERS, INC.**

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Bellville, TX 77418

(979) 413-2100

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*Stevens*  
*§ 180.213*  
*Markings of Cylinders*  
*04-0045*

February 25, 2004

Ryan Posten  
US DOT  
Office of Exemptions & Approvals  
400 7<sup>th</sup> Street, S.W.  
Washington, DC 20590

Dear Mr. Posten;

CFR 49 180.213 (e) states the size of the marking must be at least 6.35mm (1/4 in), except RIN characters must be at least 3.18mm (1/8 in.) high.

On MC & B cylinders there is a minimal area available to stamp. The manufacturing stamping is all done in smaller than a 1/4in.character because of the limited room.

As long as the stamping is legible as required is it permissible to use a smaller than a (1/4in.) character stamps for the retest dates.

Please advise in writing at your earliest convenience.

Respectfully Submitted,

Kathy McKenzie  
Safety & Compliance Director

04 MAR -3 AM 11:05

DOT/RSPA/OHMS  
UNIT