



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

NOV 21 1997

Mr. Edward O'Brien
Fire Protection Certification
8719 Pete Wiles Road
Middletown, MD 21769

Reference No.: 05-0266

Dear Mr. O'Brien:

This responds to your letter concerning the cylinder requalification marking requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if a pressure sensitive label displaying the requalification markings may be placed on the sidewall of a composite (fiber wrapped) cylinder used as a fire extinguisher.

Section 180.213(c)(1) authorizes a cylinder used as a fire extinguisher to be marked by using a pressure sensitive label. It is permissible to place the label on the sidewall of a cylinder. Stamping the markings on the cylinder sidewall or any part of the fiber wrapped surface is prohibited.

I trust this satisfies your request.

Sincerely,

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



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MEMBER

*Corbin
§180.213
Markings
05-0260*

October 12, 2005

U.S. Dept. of Transportation
Office of Hazards Materials Standards OHMS
Attn: Edward Mazzullo
400 Seventh Street SW
Washington, DC 20590

Re: interpretation of placement of labels

In section 180.213 b of 49 CFR it states, referencing marking “ unless authorized by cylinder specification, marking on the cylinder sidewall is prohibited”. Section 180.213© (1) states, a cylinder used as a fire extinguisher may be marked using a pressure sensitive label. It has been the practice that fiber wrapped cylinders when requalified are marked with a label that is affixed to the cylinder sidewall and epoxied.

The request for interpretation is, does the prohibiting of sidewall marking apply to stamping of a cylinder only and that labels attached to requalified cylinders such as fire extinguishers and fiber wrapped cylinders can be placed on the side wall of these cylinders?.

Sincerely

Edward O'Brien
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