



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

JAN -5 2006

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

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

Ref No.: 05-0270

Dear Mr. O'Brien:

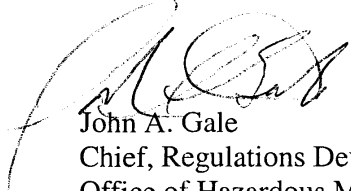
This is in response to your October 12, 2005 letter requesting clarification of the record retention requirements for cylinder requalifiers under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask which number a requalifier should maintain in his records as the serial number when recording the performance of a 12-year hydrostatic test on a DOT 4B cylinder used as a fire extinguisher. You indicate that two numbers are marked on the cylinder – a batch number that applies to an entire lot of cylinders is stamped on the shell, and a serial number is displayed on the manufacturer's label. The cylinder was manufactured by Amerex Corporation.

Section 178.35(f) requires each specification cylinder to be marked with a serial number. For the purpose of cylinder identification, § 180.215(b)(2) requires the person performing cylinder requalification to record and retain the serial number of the cylinder that was tested.

In the situation you describe, it is likely that the cylinder was manufactured by Amerex Corporation under DOT exemption DOT-E 9837. The exemption authorizes Amerex Corporation to stamp the lot number instead of the serial number on DOT 4B cylinders. The lot must consist of less than 500 cylinders and each cylinder must have a volumetric capacity not exceeding 170 cubic inches and a service pressure not exceeding 200 psig. Assuming that your cylinder meets DOT-E 9837, your records should display the lot number that is permanently stamped in the cylinder. The serial number may be entered as additional information to clearly identify the cylinder.

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

Sincerely,


John A. Gale
Chief, Regulations Development
Office of Hazardous Materials Standards



050270

180.215(b)(2)



FIRE PROTECTION CERTIFICATION

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MEMBER

October 12, 2005

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

Supko
§ 180.215(b)(2)
Cylinders
05-0270

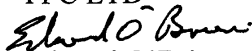
Ref: Interpretation of serial # recording

I conduct DOT Haz Mat training for Fire Protection Companies throughout the U.S.. It has been brought to my attention several times that there are 4B cylinders manufactured as fire extinguishers by Amerex Corp. that have the same serial number stamped into the shell. I contacted Amerex and they advised me that they have made batches of these units with the same serial number for the batch. When it is finally assembled and filled as a fire extinguisher it gets a label attached with a serial number that identifies that unit.

The request for interpretation is as units are due for their 12 year Hydrostatic test, what number do cylinder requalifiers put on their records when they requalify these units, the batch number stamped on the shell or the serial number on the label attached to the shell?.

Sincerely

FPC LTD


Edward O'Brien

President

C.C. Linda Cooper
Ryan Posten
Raymond LaMagdelaine
Colleen Abbenhaus
Daniel Derway
Billy Hines
John Heneghan