



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

MAY 29 2013

Mr. Paul Kleier, Jr.
President
Complete Cylinder Service, Inc.
1240 Glendale Milford Road
Cincinnati, OH 45215

Reference No. 13-0032

Dear Mr. Kleier:

This is in response to your January 17, 2013 letter asking for clarification of the "DT" and "S" marking requirements for cylinders prescribed in §§ 173.304a(d)(4) and 180.213(f)(4) and 180.213(f)(6), respectively, of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You ask if the "DT" stamp marked on a cylinder represents that a cylinder valve is equipped with a dip tube or siphon tube. You also ask if an "S" stamp marked on a cylinder may be used to represent that the cylinder is equipped with a siphon tube and that it has successfully completed a "proof pressure test."

Under the HMR, the letters "DT" stamped on a cylinder mean that the cylinder is equipped with a removable-type, fixed-length dip tube gauging device (here-in referred to as "dip tube") that may be used to verify the quantity of its contents, and that the cylinder complies with specific design and hazardous material content requirements prescribed in § 173.304a(d)(4). These requirements include that the cylinder: 1) must only contain liquefied petroleum gas with a specific gravity of 0.504 or greater at 16 °C (60 °F), 2) has a water capacity of 90.72 kg (200 pounds) or more, 3) is stamped on its exterior surface and on the exterior of the dip tube with the letters "DT," and 4) is stamped on its dip tube after the DT stamp with the length of the dip tube expressed in inches and carried out to one decimal place (see § 173.304a(d)(4)). The letter "S" stamped on a cylinder represents that the cylinder has either successfully completed the proof pressure test prescribed in § 180.209(e), or that it is a successfully requalified shell of a DOT 8 series cylinder (see § 180.213(f)(4) and (f)(6)). The letter "S" does not represent that a cylinder is equipped with a siphon tube.

I hope this satisfies your request.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

COMPLETE

Cylinder Service, Inc.

1240 Glendale Milford Road, Cincinnati, Ohio 45215

Edmonson
§180.213
Cylinders
13-0032

January 17, 2013

U.S. DOT
PHMSA Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

To whom it may concern:

As a cylinder retester for 30 years I have heard many different interpretations regarding the stamping of either "S" or "DT" immediately following the test date on a cylinder to denote that the valve (and cylinder) contains a dip-tube or siphon tube. As I read section 180.213 of the CFR Title 49 specifically paragraph "D" it seems to me that only the described markings are permitted. Obviously someone stamping an "S" behind the test date would be signifying a proof pressure test was performed, which would seem to eliminate the practice of stamping this same letter to denote a siphon tube. In any case I would greatly appreciate an interpretation of this paragraph as it relates to this practice.

Sincerely,



Paul Kleier Jr.

Complete Cylinder Service

COMPLETE

Cylinder Service, Inc.

1240 Glendale Milford Road, Cincinnati, Ohio 45215

PAUL KLEIER, Jr.
President
paul@completecylinder.com

Phone: 513-772-1500
Fax: 513-772-0154
Cell: 513-325-6339

The cylinder testing experts.

Phone: 513-772-1500

Fax: 513-772-0154

www.completecylinder.com