



U.S. Department of Transportation  
Pipeline and Hazardous Materials  
Safety Administration

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

**MAR 28 2011**

Mr. James A. Sherman  
Maintenance Production  
Control Specialist  
Department of State INL/A  
1038 S. Patrick Dr. HGR 985  
Patrick AFB, FL 32955

Ref. No. 09-0236

Dear Mr. Sherman:

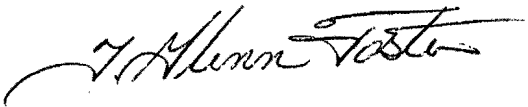
This responds to your e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requalification requirements for DOT specification 3A and 3AA cylinders as specified in § 180.209. We apologize for the delay in responding and any inconvenience it may have caused. Your questions are paraphrased and answered as follows:

- Q1. Under § 180.209(b), if a cylinder is removed from a cluster, bank, group, rack, or vehicle for inspection and is not returned to that particular form of exclusive service, what must occur?
- A1. As specified in § 180.209(b)(3), the cylinder must be requalified five years from the marked test date or prior to the first filling with a compressed gas if the required five-year requalification period has passed. Additionally, the “star” indicating exclusive service following the most recent test date must be obliterated.
- Q2. If a cylinder is no longer in service as part of a cluster, bank, group, rack or vehicle and its inspection (requalification) becomes due, how long may the cylinder be used before it must be inspected (requalified)?
- A2. As specified in § 180.205(c), no cylinder may be filled with a hazardous material and offered for transportation in commerce unless that cylinder has been successfully requalified and marked in accordance with the HMR. A cylinder filled before the requalification becomes due may remain in service until it is emptied. A cylinder with a specified service life may not be refilled and offered for transportation after its authorized service life has expired. This requirement is applicable regardless of whether the cylinder is part of a cluster, bank, group, rack, vehicle, or otherwise.

- Q3. Please define "cluster, bank, group, rack or vehicle" as it is used in the HMR.
- A3. The term "cluster, bank, group, rack or vehicle" is not currently defined in the HMR. As used in § 180.209(b), it represents a generalization of a type of service where one or more cylinders are secured and transported in or on a vehicle in a cluster, bank, group or rack specifically designed for such transportation. See § 177.840(a).

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "T. Glenn Foster".

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

**Drakeford, Carolyn (PHMSA)**

**From:** Gorsky, Susan (PHMSA)  
**Sent:** Tuesday, October 20, 2009 7:29 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Cc:** Mitchell, Hattie (PHMSA); Mazzullo, Ed (PHMSA)  
**Subject:** FW: Clarification of 49 CFR

Stevens  
 § 180.207  
 Cylinders  
 09-0236

**From:** PHMSA\_Guidance\_Complaints (PHMSA)  
**Sent:** Tuesday, October 20, 2009 6:15 AM  
**To:** Mitchell, Hattie (PHMSA)  
**Cc:** Mazzullo, Ed (PHMSA); Gorsky, Susan (PHMSA)  
**Subject:** FW: Clarification of 49 CFR

Would you please respond to this request?

**From:** Sherman, James A. [mailto:shermanj@ginl.state.gov]  
**Sent:** Monday, October 19, 2009 4:05 PM  
**To:** PHMSA\_Guidance\_Complaints (PHMSA)  
**Subject:** Clarification of 49 CFR

To whom it may concern;  
 I would like some clarification regarding 49 CFR 180.207

DOT 3A, 3AA	5/3 times service pressure, except noncorrosive service ( see §180.209(g))	5, 10, or 12 ( see §180.209(b), (f), (h), and (j))
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*"(b) DOT 3A or 3AA cylinders. (1) A cylinder conforming to specification DOT 3A or 3AA with a water capacity of 56.7 kg (125 lb) or less that is removed from any cluster, bank, group, rack, or vehicle each time it is filled, may be requalified every ten years instead of every five years, provided the cylinder conforms to all of the following conditions..."*

*"(f) Poisonous materials. A cylinder conforming to specification DOT 3A, 3AA, 3B, 4BA, or 4BW having a service pressure of 300 psig or less and used exclusively for methyl bromide, liquid; mixtures of methyl bromide and ethylene dibromide, liquid; mixtures of methyl bromide and chlorpicrin, liquid; mixtures of methyl bromide and petroleum solvents, liquid; or methyl bromide and nonflammable, nonliquefied compressed gas mixtures, liquid; commercially free of corroding components, and protected externally by a suitable corrosion resistant coating (such as galvanizing or painting) and internally by a suitable corrosion resistant lining (such as galvanizing) may be tested every 10 years instead of every five years, provided a visual internal and external examination of the cylinder is conducted every five years in accordance with CGA Pamphlet C-6. The cylinder must be examined at each filling, and rejected if a dent, corroded area, leak or other condition indicates possible weakness.*

*(h) Cylinders containing anhydrous ammonia. A cylinder conforming to specification DOT 3A, 3A480X, or 4AA480 used exclusively for anhydrous ammonia, commercially free from corroding components, and protected externally by a suitable corrosion-resistant coating (such as paint) may be requalified every 10 years instead of every five years..."*

*(j) Cylinder used as a fire extinguisher. Only a DOT specification cylinder used as a fire extinguisher and meeting Special Provision 18 in §172.102(c)(1) of this subchapter may be requalified in accordance with this paragraph (j).*

My questions are as follows:

10/20/2009

If a cylinder that is marked with a 5 point star to indicate 10 year inspection period is removed from the cluster, bank, group, rack, or vehicle for inspection but it is NOT reinstalled in the cluster, bank, group, rack, or vehicle. Then what happens? The way I interpret the CFR is that the star is removed / obliterated and the inspection period reverts to a 5 year time period.

Also, if the cylinder is now a single, not installed in a cluster, bank, group, rack, or vehicle, how long can the inspection be overdue? I.E. the inspection was due in May 08, and the cylinder is still half full as of Oct 09, Can it still be used? When should it be exchanged?

I would also like the PHMSA definitions of: cluster, bank, group, rack, or vehicle.

Thank you for your help and support.

Sincerely, Jim

*James A Sherman*

**Maintenance Production Control Specialist**

**Dept of State INL/A**

**1038 S. Patrick Dr. HGR 985**

**Patrick AFB, FL. 32955**

**321-783-9821 x33301 - Office**

**321-514-5589 - Cell**

**321-323-5948 - Fax**