



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

NOV 24 1999

Mr. Fred A. Nachman
President, Thunderbird Cylinder, Inc.
4209 E. University Drive
Phoenix, AZ 85034-7315

Ref. No. 99-0277

Dear Mr. Nachman:

This is in response to your letter dated October 7, 1999, requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR 171-180). Specifically, you ask whether the depth measurement of a gouge, dig or cut in a DOT specification acetylene cylinder is measured from the original wall of the cylinder or from the top to the bottom of the gouge, dig or cut itself. You enclosed a sketch depicting a gouge in the center of a dent.

The HMR do not currently provide for a measurement when a gouge is inside of a dent, as depicted in your sketch. Section 173.34(e)(18) of the HMR prescribes that a DOT specification acetylene cylinder must be requalified in accordance with the Compressed Gas Association (CGA) Pamphlet C-13. Based on the criteria contained in the pamphlet, two measurements must be taken. The dent is evaluated according to the criteria prescribed in paragraph 4.6.3 and the depth is measured as represented by A on my enclosure. The gouge is evaluated according to the criteria prescribed in paragraph 4.6.4 and the depth is measured as represented by B. If either measurement does not meet the tolerances specified in CGA Pamphlet C-13, the cylinder must be condemned.

I hope this information is helpful. Should you have further questions, please contact us.

Sincerely,

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

Enclosure

cc: Mr. Carl Johnson
Compressed Gas Association Inc.

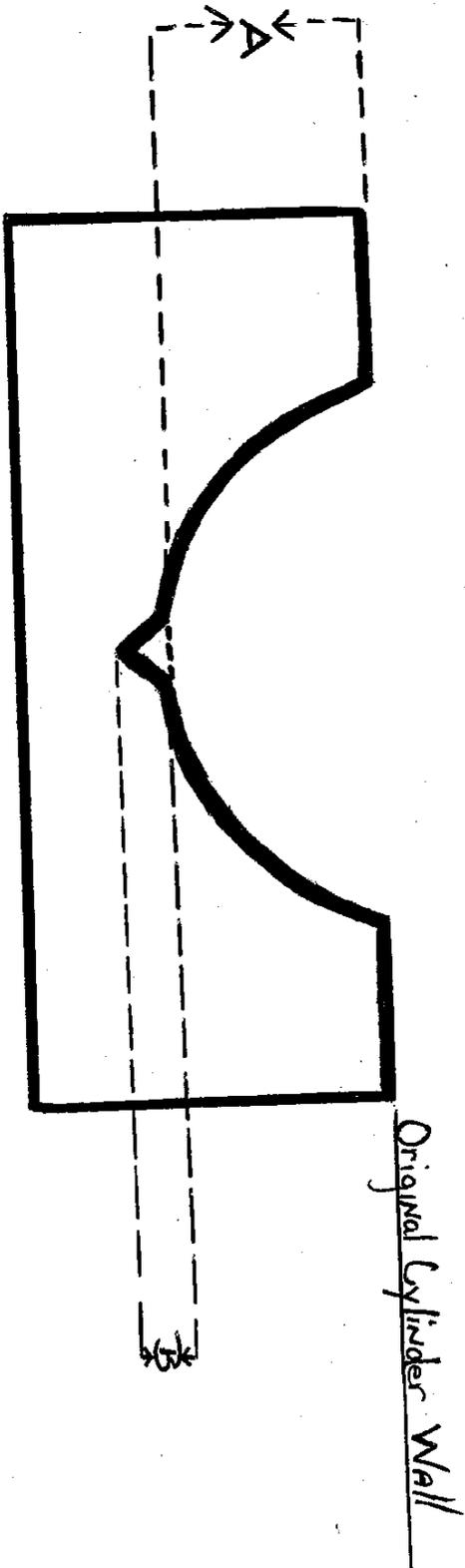


990277

173.34

Dent Depth = A

Gauge Depth = B



Attachment

Original Cylinder Wall



4209 E. University Drive
Phoenix, AZ 85034-7315
(602) 437-4600
Fax (602) 437-5052
E-Mail: fredn@cylinder.com

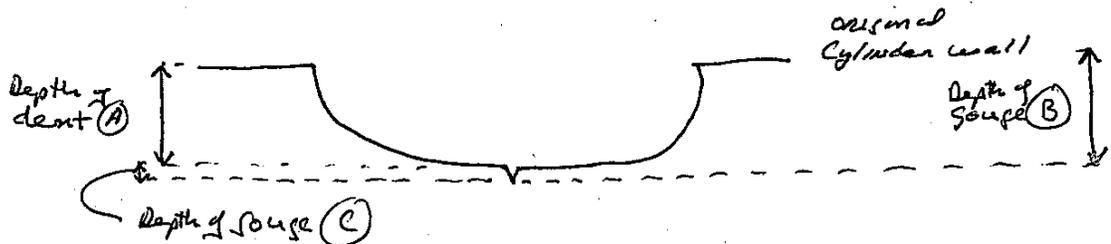
Butter
\$173.34
99-0277

October 7, 1999

Mr. Edward Mazzulla
Office of Hazardous Material Standards
DHM-10
400 Seventh Street
Washington, D.C. 20590

Dear Mr. Mazzulla,

When measuring a gouge, dig or cut in an acetylene cylinder, do you measure its depth from the original wall of the cylinder or the top to the bottom of the gouge, dig or cut itself? How would you know from CGA Pamphlet C13? Please see the drawing below:



Thunderbird Cylinder, Inc.


Fred A. Nachman
President

(DOTgouge1099.doc)