



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAR 24 2000

Mr. Glenn Curtis
Taylor-Wharton
4075 Hamilton Blvd.
Theodore, AL 36582

Ref. No: 00-0046

Dear Mr. Curtis:

This is in response to your February 7, 2000, letter requesting clarification of the term "lot" as it pertains to DOT specification 4L welded cylinders under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

Q. We manufacture different cylinder models that are identical in all respects, except for a 7%-8% volumetric capacity due to a difference in shell length. May the two models be considered a "lot" provided their combined quantity doesn't exceed 200?

A. No. A "lot" is considered to be cylinders of the same size that are successively produced in the same shift (see § 178.65(f)). Although § 178.65 pertains to DOT Specification 39 cylinders, "lot" has the same meaning throughout the HMR. This will be clarified in a future rulemaking action.

Q. Due to a delay we interrupt manufacturing of a lot of cylinders. At some later time we resume production using the same heats of materials, designs, equipment, and process. Are all cylinders manufactured both before and after the interruption considered as one "lot" in relation to the testing requirements of § 178.57(l)(1)(2) or (3)?

A. No, for the same reasons.

I hope this information is helpful.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



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178.57



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 **harsco** | Gas & Fluid
corporation | Control Group

February 7, 2000

RSPA Office of Hazardous Materials Standards (DHM 10)
U.S. Department of Transportation
400 Seventh Street, SW.
Washington, DC 20590-0001

Re: Interpretation Request

To Whom It May Concern:

In a review of our manufacturing operation, discussions emerged prompting us to seek your interpretation for a couple of issues concerning "a lot" as it relates to 49CFR178.57, Specification 4L Welded Insulated Cylinders.

- Assume we manufacture, back to back, different cylinder models that are identical in all respects, except for a 7%-8% volumetric capacity difference resulting from a different shell length. Are we correct, in our determination that the 2 models could be considered "a lot" provided their combined quantity doesn't exceed 200?
- Assume, because of time constraint or another extraneous delay, we interrupt manufacturing of a lot of cylinders, and at some later time, resume production using the same heats of materials, designs, equipment, and process. Are we correct in our determination that all the cylinders manufactured both before and after the interruption can be considered as 1 lot in relation to the testing requirements of 49CFR178.57, (l), (1), & (2) or (3)?

I'm looking forward to your response.

I can be reached at 334-443-2205 between the hours of 7:00 AM and 4:00 PM, Central Daylight Savings Time.

Respectfully,

Glenn Curtis
Quality Assurance Manager

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