



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

AUG 20 2001

Ref. No. 01-0128

Mr. Fred Bali
Aidant Cylinder Maintenance Co.
15836 North 77th St.
Scottsdale, AZ 85260

Dear Mr. Bali:

This is in response to your letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) concerning requalification requirements for acetylene cylinders. You state that you perform acetylene cylinder requalifications for a customer who asks that you not perform the examination and replacement of defective fuse plugs. You state that the customer wants to perform this portion of the requalification and you ask whether this is prohibited under the 49 CFR. You also ask whether "extruded metal" in paragraph 5.4.8 of the Compressed Gas Association's (CGA) pamphlet C-13 allows for any amount of extrusion without the cylinder being considered defective.

Section 173.34(e)(18)(ii) specifies that an acetylene cylinder requalification may be performed only by a person holding a valid RIN (retester identification number). The person holding the RIN that is marked on the acetylene cylinder is the person certifying that the cylinder has been fully requalified in accordance with the requirements in § 173.34 and CGA pamphlet C-13. Therefore, if you do not perform the examination and replacement of defective fuse plugs, you may not mark your RIN number on the cylinder.

With regard to whether the examination for extruded metal in accordance with the CGA pamphlet C-13 allows for any amount of



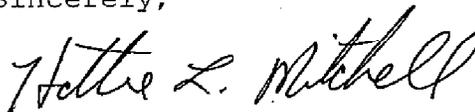
01-0128

173.34

extrusion without being considered defective, the answer is no.

I hope this information is helpful. Please contact this office if we may be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Hattie L. Mitchell". The signature is written in dark ink and is positioned above the typed name.

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



McIntyre
 3173.34
 Cylinders
 01-0128

Department of Transportation
 Standards Office
 Attn: Edward Mazzullo
 400 Seventh Street SW
 Washington, D.C.

May 17, 2001

Mr. Mazzullo,

We have spoken by telephone on 5-17-01 with Sandra Webb of the D.O.T. Enforcement Group. She suggested that we contact your group for a letter that would clarify the D.O.T.'s position regarding "fusible metal pressure relief devices" when used in acetylene cylinders. We have been asked by a customer to not replace these "fuse plugs" when their cylinders are refurbished at our facility. The customer would like to replace the fuse plugs at their location and at their discretion. Our concern is that by not replacing these fuse plugs during the refurbishing process, we would not be doing a complete shell inspection as outlined in CGA C13 5.4.8. and CFR 49 173.34

We would like to know the D.O.T.'s position on the replacement of these fuse plugs so we may pass this information on to our customer.

Please contact me if you require additional information

Sincerely

Fred Balli
 Dept 15
 Cylinder Manager / Hydrottest Supervisor

ALSO REQUESTS
 RESPONSE TO
 WHETHER "EXTRUDED
 METAL" ALLOWS
 FOR ANY AMOUNT OF
 EXTRUSION.

15836 North 77th Street
 Scottsdale, Arizona 85260
 Office 602.607.4600
 Fax 602.607.4601

480/607-4600