



U.S. Department
of Transportation

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

**Pipeline and
Hazardous Materials Safety
Administration.**

JAN - 5 2006

Mr. Edward O'Brien

Ref No.: 05-0270

President

Fire Protection Certification

8719 Pete Wiles Road

Middletown, MD 21769

Dear Mr. O'Brien:

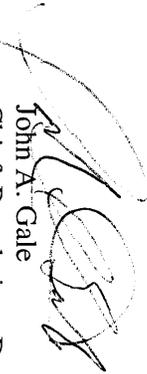
This is in response to your October 12, 2005 letter requesting clarification of the record retention requirements for cylinder regulators under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask which number a regulator should maintain in his records as the serial number when recording the performance of a 12-year hydrostatic test on a DOT 4B cylinder used as a fire extinguisher. You indicate that two numbers are marked on the cylinder -- a batch number that applies to an entire lot of cylinders is stamped on the shell, and a serial number is displayed on the manufacturer's label. The cylinder was manufactured by Amerex Corporation.

Section 178.35(f) requires each specification cylinder to be marked with a serial number. For the purpose of cylinder identification, § 180.215(b)(2) requires the person performing cylinder regualification to record and retain the serial number of the cylinder that was tested.

In the situation you describe, it is likely that the cylinder was manufactured by Amerex Corporation under DOT exemption DOT-E 9837. The exemption authorizes Amerex Corporation to stamp the lot number instead of the serial number on DOT 4B cylinders. The lot must consist of less than 500 cylinders and each cylinder must have a volumetric capacity not exceeding 170 cubic inches and a service pressure not exceeding 200 psig. Assuming that your cylinder meets DOT-E 9837, your records should display the lot number that is permanently stamped in the cylinder. The serial number may be entered as additional information to clearly identify the cylinder.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,


John A. Gale

Chief, Regulations Development
Office of Hazardous Materials Standards



050270

180.215 (b)(2)

F P C LTD

FIRE PROTECTION CERTIFICATION

8719 Pete Wiles Road • Middletown, Md. 21769

(301) 371-8685 • (888) 670-2965 • Fax: (301) 371-4528

Email: fpctld@aol.com Web: www.fpctld.com



October 12, 2005

U.S. Dept. of Transportation
Office of Hazards Materials Standards OHMS
Attn: Edward Mazzullo
400 Seventh Street, SW
Washington, DC 20590

*Supple
\$ 180 . 215 (B) (2)
Cylinders
05-0270*

Ref: Interpretation of serial # recording

I conduct DOT Haz Mat training for Fire Protection Companies throughout the U.S.. It has been brought to my attention several times that there are 4B cylinders manufactured as fire extinguishers by Amerex Corp. that have the same serial number stamped into the shell. I contacted Amerex and they advised me that they have made batches of these units with the same serial number for the batch. When it is finally assembled and filled as a fire extinguisher it gets a label attached with a serial number that identifies that unit.

The request for interpretation is as units are due for their 12 year Hydrostatic test, what number do cylinder regulators put on their records when they requalify these units, the batch number stamped on the shell or the serial number on the label attached to the shell?

Sincerely
FPC LTD
Edward O'Brien
Edward O'Brien
President

C.C. Linda Cooper
Ryan Posten
Raymond LaMagdelaine
Colleen Abbenhaus
Daniel Derway
Billy Hines
John Heneghan