



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

MAR 23 2006

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

Ms. Amy Morgan Bruecks
City Carbonic Sales & Service
Company, Inc.
406 S.W. 4th Street
Oklahoma City, OK 73109

Ref. No.: 05-0218

Dear Ms. Bruecks:

This responds to your September 9, 2005 letter asking if a DOT-3HT specification cylinder may be used for "paintball" service and then be hydrostatically retested in accordance with §180.209 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

The HMR provides that a DOT-3HT specification cylinder is authorized for aircraft use only and only for nonflammable gases. The HMR also prescribes the requalification requirements for DOT-3HT cylinders. In accordance with §180.209(k), in addition to the other requirements of this section, a cylinder marked DOT-3HT must be requalified in accordance with CGA C-8 pamphlet.

For reasons of safety, it is at the discretion of an authorized retester whether it will accept a cylinder for requalification and perform a hydrostatic retest on the cylinder. We do not recommend retest of such cylinders that are used in unauthorized cylinder service, and suggests that you inform your customers.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards

cc: Doug Smith, PHMSA Office of Enforcement
Mike Hilder, PHMSA Office of the Chief Counsel



050218

180.209(k)

Engraving
§ 180.209(k)
Cylinders
05-0218



City Carbonic Sales & Service Co., Inc.
406 S.W. 4th Street
Okiahoma City, OK 73109

Phone: (405) 239-2068
Toll Free: (800) 286-4291
Fax: (405) 236-5429

September 9, 2005

Office of Hazardous Materials Standards
DHM-10
Attn: Mr. Edward Mazzulo
400 Seventh Street, S.W.
Washington, D.C. 20590

VIA FACSIMILE: 202-366-3012

Subject: Request for a letter of interpretation

Can you please help my company with a written letter of clarification on the following issue?

CFR 49 § 180.209 Requirements for requalification of specification cylinders

(k) *3HT cylinders*. In addition to the other requirements of this section, a cylinder marked DOT-3HT must be requalified in accordance with CGA C-8 (IBR, see §171.7 of this subchapter).

CGA C-8 states:

- 1.3 Cylinders made in accordance with 3HT specifications are similar to those made under 3AA specifications in function and methods of fabrication. The major difference is that 3HT specification cylinders are containers only for inside aircraft use; are made to a higher allowable design stress; and, therefore, have a thinner wall thickness and a lower weight.
- 2. Filled 3HT series cylinders shall be shipped in suitable outside containers such as corrugated cartons or wooden boxes, which are considered sufficient to protect the cylinders from the adverse affects of rough handling during shipment. It is strongly recommended that empty 3HT series cylinders also be stored and transported in the same type of outside container to prevent damage to the cylinder.

We have had numerous 3HT cylinders designed for paintball service come in for hydro test. It is my interpretation that 3HT specification cylinders are not suitable and thus may not be used for paintball service. Cylinders in paintball service definitely do not receive the delicate treatment mentioned in CGA C-8 section 2.

Can 3HT paintball cylinders be tested, filled and used in such a manner? Is the paintball service a suitable application for 3HT specification cylinders?

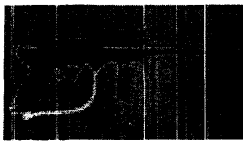
The manufacture of the cylinders I refer to is M9001, Gas Cylinder Technology Inc., P.O. Box 3188, STN Main, Tecumseh, Ontario N6N 2M4 Canada.

Thank you for your assistance in this matter.

Sincerely,



Amy Morgan Bruecks
President
RIN B435



paintball hydro test

American Paintball tank hydrotest specialists. Hydro Testing with a 24 hour turn around \$16.95. Nitro and HPa, CO2 and Steel 3ht. We hydrotest the Hydrotesting 24/7

Home hydro test

American Paintball Tank Hydro testing @ \$16.95 and only \$5 shipping.

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When To Test hydrotest (look up your bottle)

Fill out The Form hydro

General Info hydrotested

Turn Around Time

Questions/Answers?

Shipping tank test

Payment? hydrostatic

Links

"No Financial Info is required over the internet"

Visitors:

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VIEW SITE STATS

American Paintball Tank Hydrotest Service

\$16.95

we hydrotest all bottles "IN HOUSE" Nothing is Sent Out

We Hydro Test ALL Co2, HPa and Nitro, TANKS, Cylinders and Bottles

DOT CERTIFIED

24 Hour Turnaround

Small Tank Specialists



We are the nations paintball hydro test specialists. We hydrotest Hpa/Nitro tanks, CO2 Bottles and 3ht Steel bottles. We are paintball players, using nitro duck, crossfire, centerflag and PMI equipment.

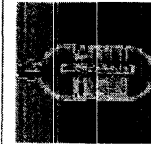
- **Welcome to HydroLab.** We are the nations #1 Hydro tester of Paintball Nitro Bottles, we test all paintball bottles, cylinders and tanks "IN HOUSE" (we don't send them out). We specialize in hydrotesting HPair (hpa) or CO2 paintball tanks from 1800, 3000 to 5000 psi. If you have a aluminum, steel(3ht) or fiberwrapped cylinder that is "out of Hydro," send that baby on in, we are the best in the US for a hydrotest.

Need your bottle hydro tested? Simply follow these 5 easy steps and you are on your way.

- **Good news:** We are PB players at the Lab. We use Centerflag, Nitro Duck, Crossfire, ACI, and PMI... we know and test them all. So, we will hydrotest your bottle, give it a good visual inspection, put on a small and attractive HYDRO sticker, verifying it has been "re-qualified" and have it in the UPS Van within 24* hours of delivery. Return shipping, is just \$5.95 any where in the US. All this will meet DOT and Field/Tournament requirements for hydrostatic re-certification.
- **The Best news:** 99.9% of all paintball bottles pass the hydro test. Why? because you guys take great care of your bottles, unlike the SCUBA guys and the fire department guys, so keep it up folks (yes, we test SCUBA and Fire Department bottles too)

*UPS does not pick up or deliver on weekends. Bottles received on Friday or Saturday are shipped on Monday.

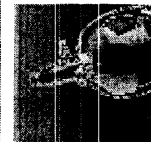
HOME CONTACT



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When to test If y have questions ab when - look here!



The Form When you're ready to se your bottle in for testing, print the f and follow the step

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Bremerton, WA 98312

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