



# OHM Newsletter

Office of Hazardous Materials

DEPARTMENT OF TRANSPORTATION / OFFICE OF THE SECRETARY / WASHINGTON, D.C. 20590

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## NOTICES AND AMENDMENTS PUBLISHED DURING MAY

5/16/72

HM-92; Amendment No. 173-62 (37 F. R. 9221 - May 6, 1972). This amendment prescribes the retest requirements for tank cars. Retest Table I contained several printing errors. Therefore, it was republished on May 24, 1972 (37 F. R. 10504).

HM-94; Amendment No. 172-15 (37 F. R. 9632 - May 13, 1972). Proposal A in HM-94; Notice No. 71-29 is covered in this amendment; Authorized Shipping Names for Liquefied Petroleum Gas.

The closing date for filing comments in the following docket falls during June:

HM-74; Notice No. 71-16 -- June 1, 1972

Notice of Special Permits issued or denied during May 1972. (37 F. R. 11700 - June 10, 1972.)

## INDEX TO THE HAZARDOUS MATERIALS REGULATIONS

The Office of Hazardous Materials has published its first index to the Hazardous Materials Regulations (49 CFR 170-180). The 101-page pamphlet contains an alphabetical key word or phrase list and section number references to the Regulations.

This index is available from the Superintendent of Documents, Government Printing Office, Washington, D. C. 20402 at fifty cents a copy. You should request "An Index to the Hazardous Materials Regulations, Title 49, Code of Federal Regulations Parts 170-180 (1972 Revision)."

This pamphlet should be equally valuable to users of tariffs that are a reproduction of the Hazardous Materials Regulations.

## COMPRESSED GAS CYLINDERS

In the May Newsletter, we brought to your attention the definitions of "Retest," "Repair" and "Rebuild" as applied to cylinders. 49 CFR § 173.34 (e)(1) states that the Bureau of Explosives must approve the apparatus and the operation for retesting cylinders. An explanation of who can perform these functions follows:

### REPAIR OF DOT 3 SERIES

Repair of certain DOT 3 series cylinders may be performed by cylinder manufacturers only. (See § 173.34 (h).) These repairs must be made in accordance with the original cylinder specification marked on the cylinder.

Heat treatment, testing, and inspection, as well as supervision of repairs by the inspector, must be performed in accordance with the original specification. The report must be prepared by the inspector in keeping with the original specification requirements which means they are to be rendered to the purchaser (owner), cylinder maker and the Bureau of Explosives.

### REPAIR OF DOT 4 AND DOT 8 SERIES CYLINDERS

Cylinder manufacturers and any repair facility approved by the Bureau of Explosives for repairing cylinders can perform the repairs authorized in section 173.34 (i).

The exclusion provided in paragraph (i)(4) of 173.34, to eliminate the need for conformance with paragraph (i)(6), is considered valid only if all six requirements in paragraphs (i)(4)(i) through (i)(4)(vi) can be met. The requirements of § 173.34 (i)(4)(ii) cannot be met in the case of older cylinders. Not only have the manufacturing processes changed over the years but "rod" is seldom used, having been replaced by "wire." Some cylinder manufacturers have ceased operations. Others have either sold or merged their companies and in so doing their management practices have changed to such an extent that information on original welding procedure, type of equipment and rod used during manufacture are not known and therefore are not available to the welder.

For these practical reasons, compliance is not considered possible in most cases when repairing cylinders without complying with § 173.34 (i)(6).

## Compressed Gas Cylinders Cont.

Again, it must be pointed out that test reports as required in the original cylinder specification must be furnished the purchaser (owner), cylinder maker (repair facility), and the Bureau of Explosives.

### REBUILDING OF DOT 4 AND DOT 8 SERIES CYLINDERS

Such rebuilding must be done by a manufacturer of these types of DOT cylinders or by a repair facility authorized by the Bureau of Explosives.

The rebuilding process must be similar to that used during original manufacture, in addition to certain other requirements. (See § 173.34 (L)(1) through (3).)

The Bureau of Explosives has indicated that few, if any, facilities other than original cylinder manufacturers are authorized to rebuild cylinders.

NOTE: Next month the Newsletter will carry an article on the ways of assuring yourself that retesting, repairing or rebuilding is being done properly and by persons authorized to perform this type of activity.

### NACE TASK GROUP TO STUDY STRESS CORROSION CRACKING OF ANHYDROUS AMMONIA IN CARGO TANKS

The National Association of Corrosion Engineers (NACE) has initiated a study of the phenomenon described as stress corrosion cracking in cargo tanks used for the transportation of anhydrous ammonia. The Chairman of the NACE Task Group has invited representatives of various industry groups as well as representatives of several government agencies to participate in the study. At its June meeting, the group reviewed reports on positive evidence of field failures attributable to ammonia. Other areas discussed were the chemistry and electrochemistry of ammonia and various concepts concerning hydrogen cracking. The study group hopes to develop information and data that will assist the Department in its determination of what action it should take to alleviate this problem.

SHIPPERS ALERTED BY FHWA

During the 9-month period ending March 31, 1972, 1,149 shippers were served with letters by the Bureau of Motor Carrier Safety, Federal Highway Administration, advising them that their operations are subject to the Hazardous Materials Regulations.

During the same period, the operations of 659 carriers and 257 shippers were surveyed to determine their compliance with the Hazardous Materials Regulations.

MOTOR CARRIER TERMINAL--SUITABLE STORAGE

DOT's Bureau of Motor Carrier Safety has issued the following response to the question of whether a motor carrier's terminal provided "suitable storage" as the term is used in section 177.853 (b) of the Hazardous Materials Regulations.

A motor carrier terminal may be considered suitable storage for hazardous material provided a specific area is designated for the hazardous material and the area is designed or constructed to provide adequate safeguards to protect the material and carrier personnel. Safeguards should include protection from theft or vandalism, heat or other extreme temperature variations, damage by fork lifts or other mechanical devices, and exposure to carrier personnel and office facilities. Signs should be posted to indicate that the area contains hazardous materials. Carriers must also recognize the restrictions in section 177.848 pertaining to loading and storage of hazardous materials.

*W. J. Burns*  
W. J. Burns  
Director  
Office of Hazardous Materials

DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE SECRETARY  
Washington, D.C. 20590

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