



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

MAR 21 2000

Mr. John Edmondson  
Director of Engineering Liaison  
Manchester Tank  
1749 Mallory Lane, #400  
Brentwood, TN 37027

Ref. No. 99-0156

Dear Mr. Edmondson:

This is in response to your letter regarding DOT specification markings on cylinders under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the serial number may be marked on the collar in a sequence other than as specified in § 178.35(f). You provided six drawings depicting serial numbers marked in various locations and asked if these variations are permitted based on § 178.35(f)(1)(iii).

The answer is no. Section 178.35(f)(1)(iii) authorizes variations in sequence only when necessitated by a lack of space. In the drawings you provided, the serial numbers appear to be marked out of sequence for a reason other than that allowed.

I trust this satisfies your request. Please contact us if we can be of further assistance.

Sincerely,

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



990156

178.35

June 10, 1999

Stevens  
§ 178.35  
99-0156

Mr. Edward Mazzullo  
US DOT RSPA  
Office of Hazardous Materials  
400 7<sup>th</sup> Street Southwest  
Washington, DC 20590

Subject: CFR 49 178.35 (f)(1)(iii)

Dear Mr. Mazzullo:

With regard to the subject listed above, in particular the statement, "other variations in sequence of markings are authorized only when necessitated by lack of space", I hereby request authorization to stamp serial numbers at the attached indicated locations. This request comes as a result of our process capability in relation to the amount of available space on our cylinder collars. I have been informed by other Manchester employees that we have previously received written authorization from RSPA, but we are unable to lay our hands on the letter at this time.

Thank you for your consideration on this matter, as I will be very grateful for your response.

Sincerely,



John Edmondson  
Director of Engineering Liaison

JE:ms  
Attachments

