



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



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180.209(k)