



Credit: Todd Russell for bringing this to our attention.

## DOT HYDROTEST REGULATIONS FOR LOW PRESSURE CYLINDERS

If your company performs hydrostatic testing of DOT Specified Cylinders using the NFPA low pressure method, new Department of Transportation clarifications can dramatically alter your current test procedures. This revisions/clarification was issued in Docket HM220A and has become final rule. Affected sections include periodic inspection and retesting of cylinders, contained in Code of Federal Regulations 49 Sections 171 and 173. Mandatory compliance was effective October 1, 1996.

The most significant change in the regulations is the required testing method for DOT specified cylinders, used as fire extinguishers and manufactured under various specifications, i.e. 4B, 4BA, 4BW, etc... Either the traditional expansion method or the DOT modified hydrotest is required for all DOT specified cylinders. Non-specification cylinders used as fire extinguishers may continue to be hydrostatically tested using the NFPA low pressure test method.

The DOT modified test and the NFPA low pressure test methods are basically the same test in theory. However, the DOT modified test method has a number of very specific requirements that must be followed. Some of the requirements are:

- **The testing facility and all testing personnel must be registered with the DOT to perform cylinder testing on all DOT specified cylinders.**
- **Current copies of CFR49, cylinder exemptions, and C.G.A. pamphlets incorporated by reference must be kept on file at the test facility at all times.**
- **All test equipment must be calibrated daily for accuracy and all test gauges must be calibrated per DOT requirements.**
- **Available records of all cylinder retests and visual inspections must be followed in accordance with specifically described DOT requirements.**
- **All visual inspections of cylinders must be performed per CGA C-6, C-6.1, C-6.2, or C-6.3 as applicable.**
- **Cylinders that pass retest, under modified hydrotest, must be stamped or marked with the month and year tested followed by the letter "S". Additionally it appears that on specification cylinders used as Fire Extinguishers must have the Retesters Identification Number marked.**
- **Since this method is without determination of expansion, for cylinders exceeding twelve pounds of water capacity, the first retest for these cylinders is required twelve (12) years after the original test date and every seven (7) years thereafter.**
- **Retesting of fire extinguishers must be in accordance with CFR49 §§173.34(e)(18).**

The above is only a brief summary of CFR49 modified test method requirements. [To be in full compliance you MUST review this DOT regulation in it's entirety.](#)

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