



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

MAR 01 2016

Mr. Brett Standifer
Manager, Fire Extinguishing Engineering
Kidde Technologies, Inc.
4200 Airport Drive NW
Wilson, NC 27896

Ref. No.: 15-0200

Dear Mr. Standifer:

This letter is in response to your August 7, 2015, request for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the marking requirements for fire extinguishers. Specifically, you ask if the following are considered permanent markings in accordance with § 178.47(q):

- Metal hand stamp with low stress type stamps
- Laser marking or engraving
- Rubber stamp with permanent marking ink
- Rubber stamp with permanent marking ink overcoated with clear paint
- Vibro hand engraving
- Dot Peen machine engraving
- Electro-chemical etching/markings
- Metal stamping on a metal label and the label affixed to the article with adhesive

As required in § 178.47(q), markings must be stamped plainly and permanently on a permanent attachment or on a metal nameplate and permanently secured to the container by means other than soft solder. All of the methods you described could be permitted as permanent markings on the cylinders provided they do not compromise the integrity of the cylinder and the markings are legible.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Andrews
178.47
Specification
15 - 0200

Goodall, Shante CTR (PHMSA)

From: Geller, Shelby CTR (PHMSA)
Sent: Wednesday, October 07, 2015 11:32 AM
To: Hazmat Interps
Subject: FW: Interpretation of 49 CFR 178.47
Attachments: DOT Interpretation Request Permanent Marking.docx

Dear Shante and Alice,

Forwarded is a request for a formal letter of interpretation.

Thanks,
Shelby

From: Fazzio, Mark UTAS [<mailto:Mark.Fazzio@utas.utc.com>]
Sent: Tuesday, October 06, 2015 5:00 PM
To: PHMSA HM InfoCenter
Subject: Interpretation of 49 CFR 178.47

Dear Sir or Madam,
Please see the attached interpretation request of 49 CFR 178.47.

Thank you,

Mark Fazzio – Senior Mechanical Engineer – Sensors & Integrated Systems
UTC AEROSPACE SYSTEMS
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UTC Aerospace Systems

August 7, 2015

Associate Administrator for Hazardous Material Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
East Building
1200 New Jersey Avenue, SE
Washington, D.C. 20590-0001

Attention: General Approvals and Permits, PHH-31

Subject: Interpretation of 49 CFR 178.47

Dear Sir/Madam:

Kidde Technologies, doing business as Kidde Aerospace & Defense (KAD), a long time manufacturer of pressure vessels used for aircraft and military vehicle fire extinguishing, is requesting interpretation of the 49 CFR 178.47(q), which states:

"Marking. Markings must be stamped plainly and permanently on a permanent attachment or on a metal nameplate permanently secured to the container by means other than soft solder"

Kidde is requesting interpretation to the above paragraph, specifically to the acceptable methods of "permanent marking".

The following methods are used in our facility. We are asking for clarification if these are considered permanent:

- Metal Hand Stamp, with low stress type stamps
- Laser marking or engraving
- Rubber stamp with permanent marking ink
- Rubber stamp with permanent marking ink then over coated with a clear paint.
- Vibro hand engraving
- Dot peen machine engraving
- Electro-chemical etching/markings
- Metal stamping on a metal label and the label affixed to the article with adhesive.

Please advise if this is an accurate interpretation of 49 CFR 178.47(q)

If any further information is needed, please contact any of the below individuals

Brett Standifer – brett.standifer@hs.utc.com, 252-246-7955

Mark Fazzio – mark.fazzio@hs.utc.com, 252-246-7910

Eric Starkey – charles.starkey@hs.utc.com, 252-246-7930

Thank you,

Brett Standifer
Manager, Fire Extinguishing Engineering, Kidde Aerospace & Defense

Kidde Technologies, Inc.
4200 Airport Drive NW
Wilson, NC 27896

Tel 252 246 7955

<http://utcaerospacesystems.com/sites/kiddeaerospace/Pages/home.aspx>