



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

JUL 31 1992

Lcdr J.J. Doudera
1728 Lake Christopher Dr.
Virginia Beach, VA 23464

Dear Lcdr Doudera:

This is in response to your April 18, 1992 letter and your telephone conversation with a member of my staff requesting authorization from this Office to refill your foreign scuba tank. You also requested a conversion of the working pressure of the cylinder from kg/cm^2 to psi.

This Department's Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) do not prohibit a non-DOT specification cylinder from being refilled and transported, provided the charged cylinder is not offered for transportation in interstate commerce. The HMR are not applicable to use of, recharging, or transportation of scuba cylinders by private individuals for personal use. However, whether or not a refiller will fill a cylinder is a matter within his own discretion and over which this Department has no control.

You should also be aware that a State may have adopted the HMR in total or in part, thereby making the cylinder regulations therein enforceable by State or local agencies. The classes of persons subject to State regulations may vary from the classes of persons subject to the Federal regulations.

With regard to the conversion, you state your cylinder has a working pressure of 200 kg/cm^2 . The corresponding pressure is 2,845 psi.

I hope this satisfies your inquiry.

Sincerely,

Hattie L. Mitchell

Hattie L. Mitchell, Chief
Exemptions and Regulations Termination
Office of Hazardous Materials Standards

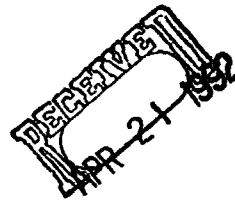
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April 18, 1992

U.S. Department of Transportation
400 7th Street Southwest
Washington, D.C. 20590
Attn: Del Billings

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SC: 334, 322

Dear Sir:

I talked to your office on Friday, 17 April. My problem concerned my Japanese manufactured Dacor Corporation Scuba compressed air cylinder. It seems that the local diving shops will not service this tank with air because it does not have the D.O.T. stamp (material and working pressure) in the neck of the bottle. I've enclosed a pencil rubbing of all identifying marks on the tank, including the recent hydrostatic test mark.

I request from your office a written official document translating the working pressure of 200kg/cm² to the corresponding PSI and a statement to the effect that filling the tank for personal use and transporting it in my private vehicle is legal under Department of Transportation regulations. My conversation with your office indicated that this procedure will be the simplest way to solve my problem. Only with authorization from your department will the local diving shops fill this air tank, which I have been using in Asia and Europe for many years.

I appreciate your support. My address is:

Lcdr J.J. Doudera
1728 Lake Christopher Dr
Virginia Beach, VA 23464

Sincerely,

J.J. Doudera

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