

**DEPARTMENT OF TRANSPORTATION (D.O.T.) DOCUMENT HM-220D**

The DOT has issued its final response to the many appeals of HM-220D. There were basically three paragraphs of interest to Amerex. They are:

1. 173.301(f)(2) – The position of DOT is to require the PRD (pressure relief device) in the vapor space of Division 2.1 (flammable gases) materials only. This means CO2 extinguishers, CO2 system cylinders, and fire protection systems using liquefied compressed gases are no longer affected and there is no need to redesign valves in those applications.
2. 173.301(f)(3) – The original proposal by DOT to replace PRD's on all high-pressure gas cylinders has been refined to the following: Division 2.2 (non-flammable, non-poisonous gases) are exempt from the requirement altogether. Additionally, the requirement does not apply to CG-2, CG-3, or CG-9 thermally activated devices, or to CG-7 reclosing pressure valves. Thus, there is no requirement to replace safety discs on CO2 extinguishers, CO2 system cylinders, nitrogen cylinders or argon cylinders used on wheeled extinguishers.
3. 177.840 – The original proposal by DOT would have prevented the shipment of CO2 extinguishers and liquefied gas systems in a horizontal position. The refined DOT position will allow the shipment of cylinders in the vertical or horizontal positions. Thus, 177.840 as revised does not adversely affect the fire protection industry. The effective date of the revised paragraphs of HM-220D is June 9, 2003.

These revisions by DOT means that the fire protection industry is not affected. There is no mandate to replace safety discs on non-flammable, non-poisonous gases, and the tolerance on existing safety discs used by manufacturers of fire protection equipment is acceptable under the new regulations. A copy of HM-220D can be found beginning on page 24653 of the May 8, 2003 Federal Register, or on the web at <http://hazmat.dot.gov/rules/68fr-24653.htm>.