#### DEPARTMENT OF TRANSPORTATION

Research and Special Programs Administration

49 CFR Part 178

[Docket No. HM-176A]

DOT 3AL Aluminum Cylinders; Safety Problems

AGENCY: Research and Special Programs
Administration (RSPA), DOT.

**ACTION:** Safety advisory and advance notice of proposed rulemaking.

SUMMARY: Cylinders made of aluminum alloy 6351 manufactured by Luxfer USA Limited in accordance with DOT Specification 3AL (49 CFR 178.46) have developed cracks during service, which occasionally result in leakage and the loss of cylinder contents. The purpose of this notice is to inform all persons that possess DOT 3AL cylinders of the problems, to identify those cylinders at risk, to suggest steps that should be taken to minimize risks, and to request comments concerning the extent of the problem and how to resolve it.

**DATE:** Comments must be received by August 10, 1987.

ADDRESS: Address comments to: Dockets Unit (DHM-30), Office of Hazardous Materials Transportation. RSPA, U.S. Department of Transportation, Washington, DC 20590. Comments should identify the docket and be submitted, if possible, in five copies. Persons wishing to receive confirmation of receipt of their comments should include a selfaddressed stamped postcard. The Dockets Unit is located in Room 8426. Nassif Building, 400 Seventh Street SW., Washington, DC 20590. Public Dockets may be reviewed between the hours of 8:30 a.m. and 5:00 p.m., Monday through Friday.

FOR FURTHER INFORMATION CONTACT: Charles Hi Hochman, Technical Division, Office of Hazardous Materials Transportation (OHMT), Research and Special Programs Administration, U.S. Department of Transportation, 400 Seventh Street SW., Washington, DC 20590, (202) 368-4545. Office Hours are 8:30 a.m. to 5:00 p.m.

SUPPLEMENTARY INFORMATION: RSPA is aware of incidents of cracks in the neck and threaded areas of DOT 3AL cylinders manufactured by Luxfer USA Limited (Luxfer) from aluminum alloy 6351. The cracking was first brought to RSPA's attention by persons retesting cylinders under the periodic retest procedures of 49 CFR 173.34.

Five cylinders suspected of having cracks were sent by RSPA to the National Bureau of Standards (NBS) for analysis. They had marked service pressures ranging from 1800 through 2200 pounds per square inch gauge (psig) and were made of both high lead content (100 parts per million or more) and low lead content (less than 100 ppm) varieties of aluminum alloy 6351. The NBS inspection and examination confirmed that each of the five cylinders

exhibited crack-like indications which were at least 0.050 inch deep.

Following the NBS analysis, RSPA requested that Luxfer provide available information concerning leaks or cracks in DOT 3AL cylinders. Luxfer provided information on the number of cylinders returned because of cracks or leakage. This information revealed the following:

(1) Of 3,278 cylinders made of high lead aluminum alloy 6351 and with tapered threads, at least 33 (1.0%) are known to have leaked or had neck or . shoulder flaws (i.e., cracks).

(2) Of 60,000 cylinders made of low lead aluminum alloy with tapered threads, 23 (0.038%) are known to have leaded or had neck or shoulder flaws.

(3) Of 312,000 cylinders made of high lead aluminum alloy 6351 with straight threads, 268 (0.086%) are known to have leaked or had neck or shoulder flaws.

(4) Of approximately 5.02 million :ylinders made of low lead aluminum alloy 6351 with straight threads, 106 (0.002%) are known to have leaked or had neck or shoulder flaws.

RSPA believes that the above statistics underrepresent the extent of the cracking and leakage problems since NBS noted in its report that identification of cracking is very difficult even when an individual is specifically

looking for cracks.

Work performed by Luxfer on neck cracking of DOT exemption hoop wrapped composite cylinders made of aluminum alloy 6351 (which have neck and shoulder areas identical to DOT 3AL cylinders but operated at a higher operating stress level) indicated that cracking is a time dependent phenomenon that is accelerated when the lead content of the alloy exceeds 100 ppm. Further, it was found that the probability of cracking increases with an increase in stress level. Analysis of the stress levels present in the necks of DOT 3AL cylinders indicated that higher stress levels are present in cylinders with tapered threads. This analysis, confirmed by the in-service data, shows that the probability of neck cracking is much higher in DOT 3AL cylinders with tapered threads. Based on Luxfer's analysis and testing, it is anticipated that the frequency of cracks and leakage will increase with the length of time these cylinders are in service. Analysis and testing performed by Luxfer also shows that, for typical DOT 3AL cylinders made of aluminum alloy 6351 (service pressure less than or equal to 3000 psig), the failure mode is by leakage of the cylinder contents and not by bursting. It should be noted that at the present time, only DOT 3AL cylinders made by Luxfer of aluminum alloy 6351 have been reported to RSPA

as having leaked or had neck or shoulder flaws (cracks). Other manufacturers of DOT 3AL cylinders made of aluminum alloy 6351 using different manufacturing processes have reported no leaks or neck or shoulder flaws in a total population in excess of 1 million cylinders. Further, all of the information available to RSPA indicates that cylinders made of aluminum alloy 6061, the other alloy authorized by specification DOT 3AL, are not susceptible to the cracking problems that have arisen in cylinders made aluminum alloy 6351.

DOT 3AL cylinders are authorized to be manufactured from two aluminum alloys, 6061 and 6351. Based on information presently available to DOT, the overwhelming majority of DOT 3AL cylinders produced have been made of aluminum alloy 6351. However, the number identifying the alloy used is not required to be stamped on the cylinder. The only way to determine which alloy was used to manufacture a DOT 3AL cylinder is through the cylinder manufacture using the serial number applied by the manufacturer when the

cylinder was made. DOT 3AL cylinders are authorized and used for the transportation of a number of extremely hazardous materials. These include poisonous and flammable gases, liquids which are toxic by inhalation (see 49 CFR 173.3a) and oxygen. It should be noted that tapered threads are required on cylinders used for Poison A materials, but not for other toxic gases that are not identified as Poison A materials such as diborane or

hydrogen selenide.

RSPA is initiating rulemaking to correct any regulatory deficiencies concerning the manufacture, maintenance and use of cylinders made under specification DOT 3AL. In the interim, this notice serves to inform all persons in possession of DOT 3AL cylinders of the cracking problem, and recommends that those persons take the following steps to minimize risks:

## DOT 3AL Cylinders Made of High Lead Aluminum Alloy 6351 With Tapered Threads

DOT 3AL cylinders made of high lead (greater than 100 ppm) aluminum alloy 6351 manufactured by Luxfer USA Limited in 1982 and 1983 bearing the serial numbers which appear in Appendix A to this document should not be refilled or used in hazardous materials service. Both RSPA and Luxfer have been in contact with the original purchasers of these cylinders and requested that the cylinders be removed from service and returned to Luxfer as soon as practicable. Persons in

possession of a cylinder listed in Appendix A should contact the cylinder supplier for proper disposition of the

### All DOT 3AL Cylinders Made of Aluminum Alloy 6351

DOT 3AL cylinders which presently contain Poison A materials, flammable gases, pyrophoric liquids or gases, liquids toxic by inhalation or highly toxic gases other than Poison A should be stored in well ventilated areas. Additionally, DOT 3AL cylinders containing oxygen, if stored or used in confined spaces, should be checked for leakage to prevent the possibility of an oxygen enriched environment.

Eash person possessing a leaking DOT 3AL cylinder which contains a Poison A material, a flammable gas, a pyrophoric liquid or gas, liquids toxic by inhalation or a toxic gas other than Poison A, should contact the material supplier (the name and address of the supplier is found on the shoulder decal of the cylinder) or the cylinder manufacturer. Leaking cylinders may not be offered for transportation.

# Advance Notice of Proposed Rulemaking

RSPA is requesting additional information from manufacturers and users of DOT 3AL cylinders. RSPA requests that anyone having information on cracked or leaking DOT 3AL cylinders provide this information to RSPA in written form. Additionally, comments are solicited on ways to address the cracking problem in DOT 3AL cylinders and controls that may be necessary for the continued use of existing cylinders.

Issued in Washington, DC, on July 6, 1987 under authority delegated in 49 CFR Part 106. Appendix A.

### Alan I. Roberts,

Director, Office of Hazardous Materials Transportation.

### PART 178-(AMENDED)

APPENDIX A-DOT BAL CYLINDERS MADE OF HIGH LEAD ALUMINUM ALLOY 6351 WITH TAPERED THREADS

Senal No.	Cast code					
ALO 11-64,						
ALO 92	. 6997					
SG 201-301	. 129-1132					
SG 303-368	131-1733					
SG 377	934					
\$G 381-382,,,,,,						
SG 392	.] 9934					
SG 395-396	933-934					
SG 416						
5G 421						
SG 425-431	932-9934					
SG 433-449						
SG 451-453						
SG 455-459						

APPENDIX A—DOT 3AL CYLINDERS MADE OF HIGH LEAD ALUMINUM ALLOY 6351 WITH TAPERED THREADS—Continued

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	Serial Net	Cast code	Senat No.	Cast code		Serial No.	Cast code
813	231 4.4	932-934	LL 18518~10587	897-898	AAI	11048-11050	934
SG	475	934	LL 18509-18636	697-698/850	AAL		231
SG	460-462	934	LL 18638-18639	697-898	AAL		934
SG	464	934	LL 18641-18653	897-898 897-898		11072-11073	934 934
SG SG	48t)- 46 7 48t)	934 933	LL 18655-18657	898		11075-11080	934
SG	503 310	933-934	LL 18760-18763	898-699	AAL	11082-11097	934
SG	520-521	934	LL 18765	899		11100	934
	525 57%	934	LL 18772-18773	899		11102-11113	934
SG	631-512 534-505	934 934	LL 18775	898 899/953	AAL		934 934
SG	538	934	LL 18792-18793	898	AAL		934
SG	5:4	933	LL 18811	953	AAL		934
SG	516-582	931-932	LL 19318	899		11135	934
SG	584	931 932	LL 31845	132 931		11143-11146,	934 934
SG	585-589	931-932	IL 2041-2042	931-932	AAL		934
SG	596-600	129-132/931-	R_ 2044	931	AAL	11184	934
		932	IL 2051,	931	AAL		934
	622-635	129-133	N_ 2064	932 931-932		11190-11191	934 934
	637 · 651	.130-133 931	IL 2098	932		11193	934
SG	6£7	934	IL 2168	932		11199-11200	934
SG	689	934	K 2170-2173	931		11204	934
56	703	934	ዚ 2177 ዚ 2183	931 931		11208-11209	934 934
SG AL	106, 725 454	101-132	IL 2188	931		11217-11219	934
AL	577-589	932-933	tL 2193	931	AAL	11228-11229	934
AL.	591-593	933	IL 2196-2199	931-932		11279 11290	934 934
AL	595-617 619	932-933 934	IL 2287	931 931	AAL		934
ΑL	6/1-6/3	934	IL 2294-2295	931	AAL	11286-11289	934
ΑL	624-633	934	IL 2297	931	AAL		934
۸L	6/5	934 934	IL 2300	931 931	AAL		934 934
AL	677-678	934/129	1L 2614	934	AAI		934
AL	681	132	IL 2629	934	AAI		931-934
AL.	683	129 129/132	IL 2633-2634	934 934	AAL		932-934 934
AL AL	685-696	120/132	IL 2645-2646	934	AAL		934
AL	69H	934	IL 2650-2652	934	AAL	1 1342-1 1348	934
ΑL	705	130	IL 2654	934	AAI		934 129-132
AL AL	704 706-735	934   129-130	IL 2657-2659IL 2662	934 934	AAI		129-130
AL	738	129	IL 2666	934		. 11422-11431	129-130/954
AL	740-741	130	BAL 3007	64	AAI		130
AL AL	743 745	130 129	BAL 3023	953 897	AAI		130/933 129-130
ΑL	746	130	BAL 3280	953		11480-11481	130
AL	753	130	AAL 10256-10295	931-932		. 11483-11484	130
AL AL	756 766	130 129	AAL 10306-10313	931-932 931	AAI	11486	932 130
AL	768-722	129	AAL 10325	931		11490	130
AL	774-776	129	AAL 10340-10367	931	AAI		130
AL AL	8601-86013	897-898 697-898	AAL 10374,	932 932	AAI	. 11494-11498	129-130 132/932
AL	88C÷3-58048	697-898	AAL 10376-10455	931-933	AAI	11506	931
AL	14 C 154	897	AAL 10463	932	AAI	11512-11515	130/931/937
AL	Bact 1 69745 1142-1146	898-899/64 850/897	AAL 10528-10567	. 931 931-933	AAI	. 13517-11541	129/133/932- 933
LL	1151-1177	8507697	AAL 10529-10567AAL 10589-10570 ,	932-933	I AAI	11543-11545	129
LL	1270	899	AAL 10572	. 933	AAI	, 11549-11553	129
LL	1287	34	AAL 10575-10576	933	^^I	11558-11583	129-130/132- 133/934
LL	1290	952/32	AAL 10587	933	IAA	11586-11590	1337934
ίί	1303	953	AAL 10589-10837	932-933		11604-11627	129/131-133/
LL	1312	897	AAL 10639-10691	931-833			932-933
ш	1314-1315 17990-16010	897 897-898	AAL 10693-10707	932-933 931-933	ا 🗚	. 11629-11771	129/131-133/ 165-172
ίĹ	18712+18015	898	AAL 10809-10814	933	AAI	11774	123
LL	pio18-180J1	897-898	AAL 10816-10905	931-933	AAI	11750	130
I.L.	16106	898	AAL 10909	934	AAI	. 11787	130
LL LL	161/2-16294	897 037-896/850	AAL 10911-10913	934	AAI	. 11790	129 130
i.	18753-18276	897-898	AAL 10927-10928	934		11795	129
LL	16280-16290	897-808/850	AAL 10946	932		. 11802-*1881	168-172
LL	18292-16915	897-898/850	AAL 10966	934	AA	12066-12092	168-172
LL	18315-16321 18321-18320	897-898/850 897-898/850	AAL 10975	. 934 . 934		12106-12119	170~171 168-171
ii	18030-18334	897-898	AAL 10991	934	SX	16567-16573	931-932
LL	19336-14350	897-898/850	AAL 10993	934		16579	931
LL.	18352-18359 19361-18368	. 897-898/850 897-898	AAL 11001	. 934 934	SX	16584-16587	931 927/931
LL.	16453- 18+59	897-898/850	AAL 11009	934	SX	16597	931
LL	16463-10476	897-898/850	AAL 11019	934	SX	16607	931
LL LL	18481 - 18496 16496 - 18500	897-898/850 897-898	AAL 11025	934 934	SX		931 932
LL	18502-18507	897-898	AAL 11043	934	Sx.		932
ΪΪ		898	AAL 11045-11046	934		16620	932

APPENDIX A-DOT 3AL CYLINDERS MADE OF HIGH LEAD ALUMINUM ALLOY 6351 WITH TAPERED/THREADS-Continued

	Serial No.	Cast code
	16623	932 129-133/932-
	16759-16841	932 129-133/931-
	16843-16966	932
SX		169-172/934
SX	17003	133 898
SX	17631	898
SX	17833-17839 17841-17845	697-898 897-898
CC	30704-30705	931
CC	30708-30709 30712-36714	931 931
CC	30716-30729	931-932
8	30774-3074B	931-932 931
œ	30752-30754	931
CC	30756-30758	931-932 934
CC	31003-31007	934
ÇÇ	31652-31633	933-934 934
CC	31040	934
CC	31051	934 934
CC	30158	934
CC	31062	934
CC	31066-31067	934 934
cc	31074-31076	934
CC	31082 31064-31090 31064-31090	934 934
CC	31902	934
CC	31107	934
CC	31124-31126	834
CC	31132	934 934
CC	31135	934
CC	31137-31138	. 934
CC	31142-31144	. 934 . 934
CC	31180	. 934
CC	31186	934 934 i
CC	31712	934
CC	31715-31717	934 934
CC	31722-31725	933-934
CC	31727-31729	934 934
ÇÇ	31846-31657	131-132/932/
CC	31860-31861	934 i 933-934
CC	31863	934
CC	31886	934 129-130/132
cc		129-130/132
CC		130-132/934
CC		129
CC	32939	131
CC		169-171 169-172
CC	36774-36780	169-171
CO		169-172 170
60		
CC	36849-36922	169-171
M		
M	A 220353-220354	262
M		262 262
M		261-262
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