



Bulletin No. 2023062

DATE: June 19, 2023
TO: Authorized ANSUL® Distributors
FROM: Product Management, Portables and Agents
SUBJECT: Shipping and Hydrostatic Test Updates for CLEANGUARD FE36 Extinguishers in the United States

On May 23, 2023, the U.S. Department of Transportation (DOT) issued a revision to special permit DOT-SP-21502 for transportation of ANSUL CLEANGUARD fire extinguishers. The revision is the result of a DOT PHMSA editorial review of the special permit with intent to provide additional clarity.

REVISED SPECIAL PERMIT DETAILS

1. Paragraph 7.b.(2) changed cylinder requalification requirements from “DOT cylinders” to “DOT specification cylinders”.
2. Paragraph (4) exemption 173.301(c) incorrectly referenced cylinders rather than packaging. This was removed from Paragraph 4 and moved to Special Provisions Paragraph 8.d and defined the requirement of the special permit number to be marked on the outer packaging. It also states explicitly the cylinder itself does not need to be marked with the special permit number.

ACTION REQUIRED

No changes are needed from earlier communication other than you must accompany the revised May 23, 2023, special permit DOT-SP-21502 letter with shipping paperwork for transportation of all FE36 extinguishers.

FAQs – CLEANGUARD Cylinder Requalification

Why do CLEANGUARD non-specification cylinders have to be requalified to DOT specification cylinder requirements?

Issuance of a DOT special permit allows some type of exception to the 49 CFR regulation. With this, there are requirements which must be abided by to ensure an equivalent level of safety. In the case of DOT-SP-21502, CLEANGUARD cylinders must be requalified to the requirements of DOT specification cylinders used as fire extinguishers. For domestic transportation, DOT regulation supersedes all other standards.

What test method is permitted to be used?

DOT permits fire extinguisher cylinder requalification by hydrostatic proof pressure or water jacket direct expansion (PVE) methods. Because it is in alignment with NFPA 10, it is recommended the hydrostatic proof pressure method be used.

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What is the initial test interval for CLEANGUARD non-specification cylinders?

The initial test interval is 12 years for all CLEANGUARD cylinder sizes.

What is the subsequent test interval?

For cylinders with water capacity of 5.44 kg (12 pounds) or less, it is 12 years. This includes FE02 and FE05S models.

For cylinders with water capacity over 5.44 kg (12 pounds), it is initially 12 years and subsequently 7 years thereafter. This includes FE09, FE13 and FE13-NM models.

Exception: If using the water jacket direct expansion (PVE) method, the subsequent interval test intervals may be extended to 12 years per DOT for all FE36 cylinders.

What is service and proof pressure?

Service pressure is nominal operating pressure at 70 deg. F (center of pressure gauge). Proof pressure is 3 times service pressure. The nameplate test pressure is the same as proof pressure.

*For additional information regarding the maintenance and testing of ANSUL CleanGuard extinguishers, please reference Manual's F-81301, Form No. 2017001 and Form No. F-7602.

Please contact ANSUL technical support with any additional questions, +1 800 862-6785.



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

May 23, 2023

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 21502
(FIRST REVISION)

EXPIRATION DATE: 2025-02-28

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Tyco Fire Products LP
Marinette, WI
2. PURPOSE AND LIMITATIONS:
 - a. This emergency special permit authorizes the transportation in commerce of non-specification cylinders exceeding 900 mL in capacity and containing a liquefied compressed gas as fire extinguishers. This special permit provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.
 - b. The safety analyses performed in development of this special permit only considered the hazards and risks associated with transportation in commerce. The safety analyses did not consider the hazards and risks associated with consumer use, use as a component of a transport vehicle or other device, or other uses not associated with transportation in commerce.
 - c. No party status will be granted to this special permit.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 172.203(a) in that shipping papers need not bear the special permit number and § 173.309(c)(2) in that the non-specification cylinder may exceed 900 mL in capacity.

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5. **BASIS:** This emergency special permit is based on the application of Tyco Fire Products LP dated January 16, 2023, submitted in accordance with § 107.117 and the determination it is necessary to prevent significant injury to persons or property and the Pipeline and Hazardous Materials Safety Administration's editorial review dated March 31, 2023.
6. **HAZARDOUS MATERIALS (49 CFR 172.101):**

Hazardous Material Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Fire extinguishers containing compressed or liquefied gas	2.2	UN1044	N/A

7. **SAFETY CONTROL MEASURES:**

a. **PACKAGING:** Packaging prescribed are non-specification cylinders containing 1,1,1,3,3,3-hexafluoropropane (HFC-236fa), a liquefied gas. Cylinders used in Tyco Fire Products LP Cleanguard extinguisher models FE02VB, FE05S, FE09, FE13, and FE13-NM must have been manufactured by Tyco Fire Products LP in accordance with drawings on file with the Office of Hazardous Materials Safety (OHMS). Fire extinguishers must be actively certified with Underwriters Laboratories to the US 2129 Standard. The cylinders must meet all requirements for non-specification fire extinguishers in § 173.309(c) except that the capacity exceeds the limit of 900 ml (55 cubic inches) for liquefied gas. The maximum capacity for prescribed cylinders is 750 cubic inches. The maximum charge pressure is 125 psig, and the test pressure is 3 times the charge pressure.

b. **TESTING:**

(1) Cylinders must be tested in accordance with the requirements of § 173.309(c) and the information submitted with the application for special permit, on file with OHMS.

(2) Cylinders must be requalified in accordance with the requirements of § 180.209(j)(1) for DOT specification cylinders used as fire extinguishers.

c. OPERATIONAL CONTROLS:

- (1) Cylinders manufactured prior to the issuance of this special permit are authorized to be transported under the terms of this special permit.
- (2) This special permit may not be used after February 28, 2025.
- (3) Continued use of this special permit will not be authorized under the provision of § 107.109(b) unless, 90 days prior to February 28, 2025, the grantee submits a plan indicating how the grantee intends to comply with the requirements of the HMR for transportation of the hazardous material authorized under the terms of this special permit. Upon receipt and review of the plan for compliance with the HMR, the prohibition against using the special permit after February 28, 2025, in paragraph 7.c.(2) may be revised to allow more time for the grantee to come into compliance with the HMR.

8. SPECIAL PROVISIONS:

- a. In accordance with the provisions of Paragraph (b) of § 173.22a, persons may use the packaging authorized by this special permit for the transportation of the hazardous materials specified in paragraph 6, only in conformance with the terms of this special permit.
- b. A person who is not a holder of this special permit who receives a packaging covered by this special permit may reoffer it for transportation provided no modification or change is made to the packaging and it is offered for transportation in conformance with this special permit and the HMR.
- c. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.
- d. The outer packaging containing a fire extinguisher(s) must be marked with the special permit number in accordance with § 172.301(c). The cylinder need not be marked with the special permit number.

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, rail freight, cargo vessel, ferry vessel, and cargo-only aircraft.

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each vessel, aircraft, or motor vehicle used to transport packages covered by this special permit. The shipper must furnish a copy of this special permit to the air carrier before or at the time the shipment is tendered.

11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:
- o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
 - o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
 - o Registration required by § 107.601 et seq., when applicable.

Each “Hazmat employee”, as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) — “The Hazardous Materials Safety and Security Reauthorization Act of 2005” (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term “exemption” to “special permit” and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. REPORTING REQUIREMENTS: Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:



for William Schoonover
Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, East Building PHH-13, 1200 New Jersey Avenue, Southeast, Washington, D.C. 20590.

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at <https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search>. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: CWF/NICKS