



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

January 19, 2022

Carlos Graca
Hydro-Test Products, Inc.
85 Hudson Road
Stow, MA 01775

Reference No. 21-0101

Dear Mr. Graca:

This letter is in response to your November 2, 2021, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to recordkeeping requirements for the visual inspection used to requalify cylinders. In your email, you note that § 180.209(g) allows for an external visual inspection to be performed in lieu of a periodic hydrostatic test and requires the results to be recorded and maintained in conformance with § 180.215. However, you note that the recordkeeping requirements include reference to more information than can be provided by an external visual inspection (e.g., actual test pressure).

We have paraphrased and answered your questions as follows:

- Q1. You ask what information must be recorded for a visual inspection performed in accordance with § 180.209(g).
- A1. A person who requalifies a cylinder using an external visual inspection only needs to provide information specified in § 180.215(b) relevant to an external visual inspection. Information such as expansion, test pressure, verification, or calibrated cylinder values do not need to be recorded as part of the recordkeeping requirements.
- Q2. You ask whether the manufacturing date and gas service must be recorded during the external visual inspection.
- A2. The answer is yes. See answer “A3” for Letter of Interpretation, Ref. No. 21-0100.
- Q3. You note a seemingly circular reference among §§ 180.209(g) and 180.215, CGA C-6, and CGA C-6.3, and ask for clarity on which regulations to follow when performing an external visual inspection of a cylinder.

A3. Section 180.209 provides requirements for the requalification of cylinders. Paragraph (g) provides conditions that allow for an external visual inspection requalification of a cylinder that is in specialized service. CGA C-6 and CGA C-6.3 are industry developed standards for the performance of a visual inspection and have been incorporated by reference into the HMR and thus—by definition—are made part of the HMR. (See § 171.8 for the definition of incorporated by reference.) Because of reliance on visual inspections as a means to requalify these cylinders, reference is made to these standards to ensure that visual inspections are performed properly and consistently by requalifiers. Finally, reference to § 180.215 provides a reminder of the requirements for reporting and recordkeeping of requalified cylinders. Thus, all are regulations that should be followed in accordance with § 180.209(g).

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

Sincerely,



Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Baker

21-0101

From: [Patrick, Eamonn \(PHMSA\)](#)
To: [Hazmat Interps](#)
Cc: [DerKinderen, Dirk \(PHMSA\)](#); [Foster, Glenn \(PHMSA\)](#)
Subject: FW: Recording Requirements
Date: Tuesday, November 2, 2021 8:49:36 AM
Attachments: [Interpretation letter2.pdf](#)

From: Carlos Graca <Carlos@hydro-test.com>
Sent: Tuesday, November 02, 2021 8:27 AM
To: Patrick, Eamonn (PHMSA) <eamonn.patrick@dot.gov>
Subject: RE: Recording Requirements

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear sir,

I do hope that you have received my previous email concerning the recording of a proof test under CFR49 section 180.215. We are also getting several questions from the cylinder re-qualification industry regarding the recording of a visual inspection when allowed to be performed in lieu of a pressure test in accordance with section 180.209(g). Attached is a request for clarification and interpretation concerning the recording requirements under CFR49, section 180.215. I would very much appreciate an expedited reply. Please contact the undersigned with any questions.

Thank you and I look forward to hearing back from PHMSA on this and my previous request

Carlos Graca
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85 Hudson Rd
Stow, MA USA 01775
978-897-4647 ext.14
Email: cgraca@hydro-test.com
www.hydro-test.com

From: Carlos Graca
Sent: Wednesday, October 27, 2021 2:34 PM

To: eamonn.patrick@dot.gov; hazmatinterps@dot.gov

Subject: Recording Requirements

Dear Patrick,

Attached is a request for clarification and interpretation concerning the recording requirements under CFR49, section 180.215. I would very much appreciate an expedited reply. Please contact the undersigned with any questions. Thank you and I look forward to hearing back from PHMSA.

Best regards,

Carlos Graca

Hydro-Test Products, Inc.

85 Hudson Rd

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Email: carlos@hydrotest.com

Standards and Rulemaking Division
Pipeline and Hazardous Materials
Safety Administration, Attn: PHH-10
U.S. Department of Transportation
East Building 1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Test record forms

Dear sir, we are getting several questions from the cylinder re-qualification industry regarding the recording of a visual inspection when allowed to be performed in lieu of a pressure test in accordance with section 180.209(g).

Our questions are as follows:

- 1) There are no expansion values, test pressures, verification or calibrated cylinder used during a visual inspection. However, section 180.209(g) does reference that "results be recorded and maintained in accordance with section 180.215." This is impossible as 180.215 has many fields that are not applicable to a visual inspection re-qualification. What fields must be recorded?
- 2) Does the "manufacturing date" and "gas service" are they required to be listed?
- 3) As with the proof test this referenced compressed gas pamphlet(s), C-6 and C-6.3, do not show the new requirements under 180.215. They do however reference 180.215, yet the regulations in 180.209(g), states to reference those CGA pamphlets. By strictly going by the CGA pamphlets and 180.209(g) a circle of confusion is completed with no answers, as both are referring to each other. What regulations do we follow? I again ask if a pamphlet should be referenced if it shows samples that do not comply with the regulations referencing them??

I appreciate your time and quick reply to this and my previous request.

Sincerely,
Carlos Graca
Cylinder Re-Qualification Training Manager

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