



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

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

JUL 23 2001

Ref. No. 01-0079

Ms. Rhonda Turner
Illinois Propane Gas Association
6450 South Sixth Street Rd., Suite B
Springfield, IL 62707

Dear Ms. Turner:

This is in response to your letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) concerning the qualification and maintenance of cylinders. Specifically, you ask whether a person who performs an external visual inspection and changes the valve on a cylinder is required to have a retester identification number (RIN) as specified in § 173.34(e)(2).

The answer is no. Section 173.34(e)(2) specifies that each cylinder retester must have a RIN issued by the Research and Special Programs Administration (RSPA). This requirement applies to a person who performs pressure retests, either a full hydrostatic test or a modified hydrostatic test. It does not apply to a person who performs only visual requalifications, as stated in the last sentence in paragraph (e)(2)(i). However, we have published a notice of proposed rulemaking under Docket HM-220 (RSPA-98-3684) that proposes to extend this requirement to include persons performing any visual requalifications. A cylinder valve may be replaced by any qualified person. However, if the cylinder valve contains a pressure relief device, it is the responsibility of the person changing the cylinder valve to ensure compliance with § 173.34(d).

I hope this information is helpful. Please contact us if you need further assistance.

Sincerely,

Hattie L. Mitchell, Chief
Regulatory Review and Reinvention
Office of Hazardous Materials Standards



McIntyre
§ 173.34
Cylinders
01-0079

March 15, 2001

Mr. Edward Mazzullo
U.S. Department of Transportation
Washington, D.C.

RE: Request for Written Interpretation

Mr. Mazzullo;

The Illinois Propane Gas Association has been approached by its members for clarification on 49 CFR 173.34 in regards to qualification and maintenance of cylinders.

In 173.34 (2) it is stating that any person retesting a cylinder must have an identification number issued by DOT. In speaking with Mr. James Jones, supervisor in the Approvals Office of DOT he states that if the person is only doing an external visual retesting (i.e. checking for dents, gouges, foot rings, collars, welds, and leaks) and stamping a date for the 5 year inspection, that this person does not need a certificate from DOT.

In speaking with Mr. Todd Hurstein, compliance office in the Illinois DOT office he states that the person doing the above does need a certificate.

Another question that has arisen is; if someone changes the valve of a DOT cylinder (they are not doing a hydro-retest or doing any actual inspecting of the internal parts of the cylinder) it is merely the changing of a valve, example; from the old style valves to the newly required OPD valves. Are these people required to have a certificate?

Please issue a written interpretation of this regulation so that we may pass this information along to our members. If you have any questions, please call 800/627-7202 or email rtumer@ilpga.org.

Cordially,

Rhonda Turner
Executive Director