



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

FEB 14 2013

Mr. Jason Spence  
9474 N. Stonebrook Drive  
Tucson, AZ 85743

Ref No.: 13-0014

Dear Mr. Spence:

This is a response to your November 30, 2012 email requesting clarification of the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-185) with regard to recordkeeping requirements for requalification of cylinders. Specifically, you ask what the term "actual dimensions" refers to with respect to the requalification records for cylinders specified in § 180.215(b).

In accordance with § 180.215(b), requalification records must be kept for examination of DOT specification cylinders by the person who performs the cylinder requalification. These requalification records include information about the cylinder such as the "actual dimensions" of the cylinders. Although the HMR does not define "actual dimensions", the term as used in § 180.215(b), refers to the outside diameter and the length of the cylinder in inches. Although it is not incorporated by reference in the HMR, this interpretation is consistent with the practices found in CGA pamphlet CGA C-1.

I hope this information is helpful. If you have any more questions, please do not hesitate to contact this office.

Sincerely,

Robert Benedict  
Chief, Standards Development  
Standards and Rulemaking Division

**Drakeford, Carolyn (PHMSA)**

Suchak  
§ 180.215  
§ 180.217

**From:** INFOCNTR (PHMSA)  
**Sent:** Friday, January 11, 2013 2:50 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: CFR Clarification/Letter of Interpretation

Cylinders  
13-0014

Hi Carolyn,

We received the following request for a formal letter of interpretation.

Thanks,  
Victoria

**From:** Jason Spence [<mailto:nitchnitchy@gmail.com>]  
**Sent:** Friday, January 11, 2013 10:56 AM  
**To:** INFOCNTR (PHMSA)  
**Subject:** CFR Clarification/Letter of Interpretation

I require some clarification and a letter of interpretation on CFR 49 Parts 180-185. It states in two sections 180.215 & 180.217(see below) that actual dimensions are required. What dimension does DOT want? How does DOT use these dimensions for cylinder identification. I've been in contact with several cylinder manufacturers and gotten several different definitions. Some say Length by Width, some say gas capacity, some say Length by Radius, some say Height by Diameter, some say Height by Circumference and some say water capacity.

§ 180.215 Reporting and record retention requirements.

(a) Facility records. A person who requalifies, repairs or rebuilds cylinders must maintain the following records where the requalification is performed:

- (1) Current RIN issuance letter;
- (2) If the RIN has expired and renewal is pending, a copy of the renewal request;
- (3) Copies of notifications to Associate Administrator required under § 107.805 of this chapter;
- (4) Current copies of those portions of this subchapter applicable to its cylinder requalification and marking activities at that location;
- (5) Current copies of all special permits governing exemption cylinders requalified or marked by the requalifier at that location; and
- (6) The information contained in each applicable CGA or ASTM standard incorporated by reference in § 171.7 of this subchapter applicable to the requalifier's activities. This information must be the same as contained in the edition incorporated by reference in § 171.7 of this subchapter.

(b) Requalification records. Daily records of visual inspection, pressure test, and ultrasonic examination if permitted under a special permit, as applicable, must be maintained by the person who performs the requalification until either the expiration of the requalification period or until the cylinder is again requalified, whichever occurs first. A single date may be used for each test sheet, provided each test on the sheet was conducted on that date. Ditto marks or a solid vertical line may be used to indicate repetition of the preceding entry for the following entries only: date; actual dimensions; manufacturer's name or symbol, if present; owner's name or symbol, if present; and test operator. Blank spaces may not be used to indicate repetition of a prior entry. The records must include the following information:

(1) Calibration test records. For each test to demonstrate calibration, the date; serial number of the calibrated cylinder; calibration test pressure; total, elastic and permanent expansions; and legible identification of test operator. The test operator must be able to demonstrate that the results of the daily calibration verification correspond to the hydrostatic tests performed on that day. The daily verification of calibration(s) may be recorded on the same sheets as, and with, test records for that date.

(2) Pressure test and visual inspection records. The date of requalification; serial number; DOT specification or special permit number; marked pressure; actual dimensions; manufacturer's name or symbol; owner's name or symbol, if present; result of visual inspection; actual test pressure; total, elastic and permanent expansions; percent permanent expansion; disposition, with reason for any repeated test, rejection or condemnation; and legible identification of test operator. For each cylinder marked pursuant to § 173.302a(b)(5) of this subchapter, the test sheet must indicate the method by which any average or maximum wall stress was computed. Records must be kept for all completed, as well as unsuccessful tests. The entry for a second test after a failure to hold test pressure must indicate the date of the earlier test.

Thanks

Jason Spence

(520)343-1103

[NitchNitchy@gmail.com](mailto:NitchNitchy@gmail.com)