



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

February 12, 2025

Tim Reilly  
REM Fire Systems Inc.  
206 S. George St.  
Rome, NY 13440

Reference No. 24-0093

Dear Mr. Reilly:

This letter is in response to your October 11, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to requalification requirements for compressed gas cylinders. In your email, you provide several photos and a description of Department of Transportation (DOT) specification compressed gas cylinders that were stored in a warehouse that was destroyed by a tornado. You state that the destruction of the warehouse caused the roof and walls to collapse onto the cylinders. Given this evidence of exposure to potential damage, you ask whether these cylinders must be condemned, requalified (by testing and inspection) before further use, or may continue to be used without requalification until their next scheduled test and inspection.

As provided in § 180.205(d), a cylinder must be tested and inspected in accordance with the requirements of § 180.205 prior to further use if—

- (1) The cylinder shows evidence of dents, corrosion, cracked or abraded areas, leakage, or any other condition that might render it unsafe for use in transportation;
- (2) The cylinder has been in an accident and has been damaged to an extent that may adversely affect its lading retention capability;
- (3) The cylinder shows evidence of or is known to have thermal damage, or have been over-heated;
- (4) Except in association with an authorized repair, evidence of removal of wall thickness via grinding, sanding or other means;
- (5) For a cylinder subject to paragraph (c)(5) of this section, if there is visible corrosion around the neck or under the flange/sleeve, as outlined in Section 4.2 of CGA C-23, it must be removed and examined in accordance with CGA C-23 before being returned to service; or

(6) The Associate Administrator determines that the cylinder may be in an unsafe condition.

Based on the photos you provided, it is likely that the cylinders subjected to the warehouse roof and wall collapse may satisfy either of the first two of the listed conditions above that warrant testing and inspection. Specifically, a cylinder that is identified as having any of those conditions listed in § 180.205(d) must be requalified by a PHMSA-approved cylinder requalifier prior to further use, including both a visual inspection in accordance with the applicable Compressed Gas Association standard (see § 180.205(f)) and then hydrostatic testing (see § 180.205(g)). Cylinders that fail the visual inspection or hydrostatic test must be rejected or condemned in accordance with § 180.205(i) and (j), respectively.

Given the scenario in which the cylinders were recovered, a knowledgeable person, such as a cylinder requalifier, might examine them to determine whether a condition exists that meets any of the § 180.205(d) criterion. Unfortunately, it is not possible for PHMSA to make a definitive determination on your behalf whether requalification is required for each cylinder in the warehouse, based solely on the photographic evidence you provided. The person in possession of the cylinder must determine—based on their knowledge, experience, and objective evidence of the condition of each cylinder—whether a criterion in § 180.205(d) has been met.

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

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Formal interpretation  
**Date:** Tuesday, October 15, 2024 4:43:26 PM  
**Attachments:** [image011.png](#)

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Hello Alice,

Please see the below interpretation request. Let us know if you need anything.

Sincerely,  
Janaye

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**From:** Tim Reilly <treilly@remfire.com>  
**Sent:** Friday, October 11, 2024 1:37 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Formal interpretation

**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.

Gentlemen:

I am requesting an interpretation of 49CFR 180.205 (d) (2) or any other section that may be relevant to the following scenario.

On July 16 an EF 2 tornado, which is significant – with 135 mph sustained winds, struck Rome, NY where our building was located. Our building (only 12 years old) collapsed in the wind storm. Inside the building were several service trucks that were found to be a total loss. Also in that structure were several (over 200) Fire suppression cylinders used in Gas island fire suppression. The entire roof system and walls collapsed on top of the cylinders and service trucks. Please see the attached pictures and understand that we removed a lot of debris so you could see the cylinders.

Nearly all of these cylinders were within the 12 year hydrostatic test requirement. There are no (or fairly few) visual indicators that these went thru a tornado. There are no dents or scratches. My concern is with the unseeable. Welds that may have a slight crack, or may have been weakened could compromise at anytime.

I feel a sense of responsibility in assuring these cylinders are in the best condition moving forward. If an incident occurs in the future with one of these cylinders, I feel it will be blamed

on me because I put a cylinder involved in a tornado into service, without taking assurances that they were ok.

I feel all cylinders that have been through this tornado (accident) should be hydrostatically tested, at a minimum, to assure its integrity.

**Does DOT see a requirement for hydrotest? Condemnation? Or can they be placed back into service without any further intervention?**

A timely response would be greatly appreciated as we are disputing with the insurance provider over the need to do this or not.

Thank you for your assistance in this matter.

*Timothy W. Reilly*

Vice President  
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COMPUTER ROOM FIRE SUPPRESSION-INDUSTRIAL FIRE SUPPRESSION-SPRINKLER SYSTEMS-EMERGENCY LIGHTING-PROFESSIONAL CODE REVIEW  
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