

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Interpretation Request - CFR49 §180.213 - Requalification Markings
Date: Tuesday, July 29, 2025 13:20:02
Attachments: [image001.png](#)

Hi Yul,

Please see the below interpretation request.

Let us know if you need anything.

Janaye

From: Kevin Turner - Bancroft <kevin.turner@bancroft.co.uk>
Sent: Tuesday, July 29, 2025 4:04 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Interpretation Request - CFR49 §180.213 - Requalification Markings

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Good morning

Please could we have a clarification on the requirements for dealing with illegible or incorrectly made requalification markings in the following instances:

1. The requalifier has stamped the cylinder with the correct characters, but the markings are illegible
 - a. Can the same requalifier stamp another requalification mark adjacent to the illegible one?
 - b. Can or should the requalifier strike out his original, illegible mark (XXXX)?
 - c. If the requalifier has taken action (a) and/or (b) above and this is not permitted, must the cylinder be condemned?
2. The requalifier has accidentally stamped the cylinder with incorrect characters
 - a. Can the same requalifier stamp another, correct requalification mark adjacent to the incorrect one?
 - b. Can or should the requalifier strike out his original, incorrect mark (XXXX)?
 - c. If the requalifier has taken action (a) and/or (b) above and this is not permitted, must the cylinder be condemned?

3. If a cylinder with one or more obliterated previous requalification marks is received into a requalification facility, can that cylinder be requalified , or must it be condemned?

Many thanks



Kevin Turner

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