

From: [Foster, Glenn \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Subject: FW: UE In lieu of Hydrostatic Testing for HP Cylinders ??
Date: Tuesday, July 29, 2025 15:10:13
Attachments: [DOTltr-UEquals18NOV2021.pdf](#)

Hello Yul,

Can you have this request checked in as a LOI and assigned to a Specialist, please?

Thanks,
Glenn

From: rmistretta@diverssupplyinc.com <rmistretta@diverssupplyinc.com>
Sent: Tuesday, July 29, 2025 1:42 PM
To: Foster, Glenn (PHMSA) <Glenn.Foster@dot.gov>
Subject: UE In lieu of Hydrostatic Testing for HP Cylinders ??

You don't often get email from rmistretta@diverssupplyinc.com. [Learn why this is important](#)

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Mr. Foster,

My name is Robbie Mistretta. I am on the board of directors for the Association of Diving Contractors. We write the Commercial Diving Standards for the United States and 21 other Countries. Our standards have been adopted by USCG and OSHA.

I am writing to you for clarification and updating on the attached letter. As we audit different commercial diving companies for compliance to the standards, we have been running into an issue that needs clarification.

When you recertify 3A, 3AA, or 3AL cylinders, can you do this using Ultrasonic Examination? In your letter it appears you need a special permit. My understanding is that UE would be great in manufacturing looking for flaws in the material during construction; but in re-certification 5 or 10 years later, only hydro-stating (volumetric expansion) of a cylinder would test the elasticity of the

steel or aluminum.

Has DOT updated this to allow for UE anytime in re-certification?

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