

Mr. Shane Kelley
Director, Standards and Rulemaking Division
U.S. DOT/PHMSA (PHH-10)
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Mr. Kelley,

Fike Corporation would like to request a letter of formal interpretation for 49 CFR 178.61. There seems to be a contradiction in material specifications between this section of DOT code and CGA C-3. Section d(4) calls out that all weld procedures must be compliant with CGA C-3. Section b(1) states that all material shall be compliant with table 1 in Appendix A. Grade 3 material in Appendix A Table 1 does not fit into any one material grouping in CGA C-3 Table 1 and the phosphorus allowance is actually higher than that allowed for any group number in CGA C-3. If grade 3 material is chosen for manufacturing 4BW welded cylinders, as 49 CFR 178.61 would allow, then it is possible that the material would not be compliant with CGA C-3. How should one reconcile the differences in material specifications between DOT regulations and CGA C-3 such that the manufactured cylinders will be fully code compliant?

Thank you,
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