From:
 INFOCNTR (PHMSA)

 To:
 Baker, Yul (PHMSA)

 Cc:
 Hazmat Interps

Subject: FW: Letter Of Interpretation Request

Date: Wednesday, October 8, 2025 16:43:07

Attachments: JJ Keller Inspection Report.pdf

Good afternoon,

Please see the following request for a letter of interpretation. Please let us know if you need anything.

Best,

Aminah

From: Mark A Hammond < Mark.A. Hammond@linde.com>

Sent: Wednesday, October 8, 2025 5:58 AM

To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Subject: Letter Of Interpretation Request

You don't often get email from mark.a.hammond@linde.com. Learn why this is importan

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.

Good morning. I have a concern regarding the use of the JJ Keller Tanker Test and Inspection Report (Please see attachment and highlighted areas). I conduct annual Visual and Leak tests only. In the area of the form "Type of Tests – Leakage Test (K)" the form gives a choice of Hydrostatic (water) and Pneumatic (air). While conducting an inspection on a Propane bobtail neither one of these seems appropriate for a flammable gas. Would the best approach be to leave the 2 choices, hydrostatic or pneumatic, blank and mark fluid used (which I always do) in the "Leakage Test" box (also highlighted under the K-EPA27 and Upper Coupler Assembly boxes)?

I have attached email communication with Jessica Stiles DOT Hazardous Materials Program Manager on this same question from 9-9-25.

Thank you.

Mark Hammond

Linde Gas and Equipment

574-210-5992

3625 S Main Street South Bend, Indiana 46614

From: Stiles, Jessica (FMCSA) < <u>jessica.stiles@dot.gov</u>>
Sent: Wednesday, September 17, 2025 9:35 AM

To: Mark A Hammond < <u>Mark.A.Hammond@linde.com</u>>

Cc: Rios, David (FMCSA) < <u>david.rios@dot.gov</u>> **Subject:** RE: JJ Keller Tank Inspection Form

CYBERSECURITY ALERT: This is an email from an external organization. Use caution, especially with links and attachments.

<u>More</u>

Hi again Mark. After consultation with PHMSA, we all agree that for a leakage test/inspection report there is no need to list whether it was pneumatic or hydrostatic, since those two terms are not used in 49 CFR 180.407(h).

However, those two terms are used in the pressure testing section of the regulation (49 CFR 180.407(g)) so you'll need to be sure to include hydrostatic or pneumatic when a pressure test report is completed.

Section 49 CFR 180.417(b)(2)(iii) also requires that the leakage test report include: identification of the fluid used for the test, test pressure, and holding time of test. So while you don't need to list pneumatic or hydrostatic, you do still have to include these three items along with all the other information required by 180.417(b). You are correct that for the "fluid used" you can list LPG as the medium if that's what was used for the test.

Thank you,

Jessica Stiles Hazardous Materials Program Manager Midwestern Service Center 360-846-3869

From: Mark A Hammond < <u>Mark.A.Hammond@linde.com</u>>

Sent: Tuesday, September 16, 2025 4:30 AM

To: Stiles, Jessica (FMCSA) < <u>jessica.stiles@dot.gov</u>> **Cc:** Rios, David (FMCSA) < <u>david.rios@dot.gov</u>>

Subject: RE: JJ Keller Tank Inspection Form

You don't often get email from mark,a.hammond@linde.com. Learn why this is important

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.

Thank you, Jessica.

From: Stiles, Jessica (FMCSA) < <u>jessica.stiles@dot.gov</u>>

Sent: Monday, September 15, 2025 11:12 AM

To: Mark A Hammond < <u>Mark.A.Hammond@linde.com</u>>

Cc: Rios, David (FMCSA) < <u>david.rios@dot.gov</u>> **Subject:** RE: JJ Keller Tank Inspection Form

CYBERSECURITY ALERT: This is an email from an external organization. Use caution, especially with links and attachments.

More

Good morning Mark.

My apologies – I'm not ignoring this email, but your question made me reevaluate how I've read this regulation for years. I've reached out to PHMSA to get their take on it and will let you know once I hear back.

Thank you,

Jessica Stiles Hazardous Materials Program Manager Midwestern Service Center 360-846-3869

From: Mark A Hammond < <u>Mark.A.Hammond@linde.com</u>>

Sent: Tuesday, September 9, 2025 6:15 AM

To: Stiles, Jessica (FMCSA) < <u>iessica.stiles@dot.gov</u>>; Rios, David (FMCSA) < <u>david.rios@dot.gov</u>>

Subject: JJ Keller Tank Inspection Form

Some people who received this message don't often get email from mark.a.hammond@linde.com. Learn why this is important

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.

Good morning. I have a question regarding the Leakage Test (Under heading "Type of Tests") on the form. There is Hydrostatic (water test?) and Pneumatic (air or inert gas?). When conducting an inspection on a propane bobtail neither description seems to be correct. Should I leave the 2 choices (Hydrostatic or Pneumatic) blank and fill out the other Leakage Test area circled about half way down the form on the right side with Liquid Propane noted as the test medium?

Thank you.

The information contained in this email and any attachments may be confidential and is provided solely for the use of the intended recipient(s). If you are not the intended recipient, you are hereby notified that any disclosure, distribution, or use of this e-mail,

its attachments or any information contained therein is unauthorized and prohibited. If you have received this in error, please contact the sender immediately and delete this email and any attachments. No responsibility is accepted for any virus or defect that might arise from opening this e-mail or attachments, whether or not it has been checked by anti-virus software.

The information contained in this email and any attachments may be confidential and is provided solely for the use of the intended recipient(s). If you are not the intended recipient, you are hereby notified that any disclosure, distribution, or use of this e-mail, its attachments or any information contained therein is unauthorized and prohibited. If you have received this in error, please contact the sender immediately and delete this e-mail and any attachments. No responsibility is accepted for any virus or defect that might arise from opening this e-mail or attachments, whether or not it has been checked by anti-virus software.

The information contained in this email and any attachments may be confidential and is provided solely for the use of the intended recipient(s). If you are not the intended recipient, you are hereby notified that any disclosure, distribution, or use of this e-mail, its attachments or any information contained therein is unauthorized and prohibited. If you have received this in error, please contact the sender immediately and delete this e-mail and any attachments. No responsibility is accepted for any virus or defect that might arise from opening this e-mail or attachments, whether or not it has been checked by anti-virus software.

I ANNER 1EST AND INSPECTION KEPORT For compliance with 49 CFR 180.407(h)(4), 180.417(b) & (c), and 40 CFR 60.505(b)		o O	INSPECTION LEST DATE HEPORT NUMBER
OWNER		CARRIER (if other than owner)	
PRINCIPAL PLACE OF BUSINESS ADDRESS		PRINCIPAL PLACE OF BUSINESS ADDRESS	9
CITY, STATE, ZIP CODE	TELEPHONE	CITY, STATE, ZIP CODE	TELEPHONE
OWNER'S TANK SERIAL NO.	DATE	CARRIER'S EQUIPMENT NO.	VESSEL MATERIAL SPEC. NO.
CARGO TANK MOTOR VEHICLE MFG. CARGO TANK MOTOR VEHICLE CERT. DATE	EHICLE CERT. DATE	TANK MANUFACTURER	MANUFACTURER'S TANK SERIAL NO.
MAX. WEIGHT OF LADING LINING MATERIALS		DOT SPECIFICATION NO. FLUID GA	FLUID CAPACITY (GALS.) ASME CODE SYMBOL
HEATING DESIGN PRESSURE DESIGN TI	DESIGN TEMPERATURE	ORIGINAL TEST DATE	MAXIMUM ALLOWABLE WORKING PRESSURE
MATERIAL		DESIGN TEMPERATURE	PSIG
EXPOSED SURFACE AREA IN SO. FT. MAX. DESIGN DENSITY OF LADING (LBS. PER GAL.)	OF LADING		TANK
TYPE OF TEST(S) CEXTERNAL VISUAL (V) CEAKAGE TEST (K) INTERNAL VISUAL (I) CHYDROSTATIC PNEUMATIC CHENING CHE	PRESSURE RETEST (P) HYDROSTATIC PNEUMATIC	AL SERVICE NTERIAL CORROSI: EDICATED SERVICE	TO TANK
	TEMS INSPECTED OBTESTED	- Constant	
EM YES NO ITEM Frangible (Rupture) Disk PI	PRESSURE	TYPE	re Test –
eads Major Appurtenances - upper coupler assembly	RELIEF DEVICES	TEST	START END STA
- suspension system - suspension system - attachments - connecting structures - Devic	Device Number	1 2 3 4 5 5 C C C C C C C C C C C C C C C C C	83
Manhole Covers Lining Material Tested Manhole Gaskets	pa	VAC	6
ning Pressure Bearing Portions of Heating System	scted	VAC.	6
Flues for Heating System	Replaced Reinstalled	S RV	
Corroded or Abraded Areas	ired	1 2	
Remote Closure Devices Denices Press Reclosing Pressure	Pressure - set to discharge	VENT	I
Welds	Pressure - when reseated		UPPER COUPLER ASSEMBLY ☐ EXAMINED IN PLACE
DELIVERY HOSE/PIPING	THICKNESS (INCHES)	MFG. MIN. TESTED	☐ REMOVED FOR EXAMINATION
ORIG. HOSE	SHELL TOP		FLUID USED
CONDITION OF HOSE ASSEMBLY & PIPING SYSTEM	SHELL SIDE SHELL BOTTOM	A P	PRESSURE HOLDING TIME
(CHECK ONE) ODEFECT OR DAMAGE	DISCOVER	DEFECTS	DISCO
Explain: NATURE AND SEVERITY:	induid priase — vapo	⊔ vapor phase ⊔ nead-to-shell seam ⊔ delivery hos	ry hose/piping □ appurtenances
METHOD OF REPAIRS: IS REPAIR CERTI	REPAIR CERTIFICATION REQUIRED? □ YES	ON I	DESIGN CERTIFYING ENGINEER REGISTRATION NO.
THIS UNIT ANHYDROUS AMMONIA (CERTIFIED AS 0.2%, WATER BY WEIGHT) (I DITFIED PETROL EIIM AS AS		□ ANY OTHER MATERIAL THAT MAY CAUSE STRESS CORROSION CRACKING	STRESS RELIEVED AFTER FABRICATION REPAIR DATE
DOT REGISTRATION NUMBER OF THE TESTING FACILITY/PERSON TEST	ATE	RELIEVED AFTER REPAIR	☐ YES ☐ NO ASME OR NATIONAL BOARD NO. OF REPAIR FACILITY
TESTED BY (Person's Name)	<u>د</u>	LI YES (LI Full Local) NO REPAIRED BY	
ADDRESS	A	ADDRESS	
CITY, STATE, ZIP		CITY, STATE, ZIP	
CARGO TANK: MEETS FAILS TO MEET THE REQUIREMENT: DISPOSITION OF CARGO TANK: WITHDRAWN FROM SERVICE	REMENTS OF THE D	☐ FAILS TO MEET THE REQUIREMENTS OF THE DOT SPECIFICATIONS IDENTIFIED ON THIS REPORT IK: □ WITHDRAWN FROM SERVICE □ RETURNED TO SERVICE MARKINGS APPI IFD	IED ON THIS REPORT MARKINGS APPI IED: IT VES IT NO
Spiriting Testing	DOT REGISTRATION NUMBER DATE	RE OF OWNE	
l opyright 2017 J. J. Keller & Associates, Inc.		Section Office of the Control of the	(7H) (AG) 8088