

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

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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) <jessica.stiles@dot.gov>
Sent: Wednesday, September 17, 2025 9:35 AM
To: Mark A Hammond <Mark.A.Hammond@linde.com>
Cc: Rios, David (FMCSA) <david.rios@dot.gov>
Subject: RE: JJ Keller Tank Inspection Form

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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 <Mark.A.Hammond@linde.com>
Sent: Tuesday, September 16, 2025 4:30 AM
To: Stiles, Jessica (FMCSA) <jessica.stiles@dot.gov>
Cc: Rios, David (FMCSA) <david.rios@dot.gov>
Subject: RE: JJ Keller Tank Inspection Form

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Thank you, Jessica.

From: Stiles, Jessica (FMCSA) <jessica.stiles@dot.gov>
Sent: Monday, September 15, 2025 11:12 AM
To: Mark A Hammond <Mark.A.Hammond@linde.com>
Cc: Rios, David (FMCSA) <david.rios@dot.gov>
Subject: RE: JJ Keller Tank Inspection Form

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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 <Mark.A.Hammond@linde.com>
Sent: Tuesday, September 9, 2025 6:15 AM
To: Stiles, Jessica (FMCSA) <jessica.stiles@dot.gov>; Rios, David (FMCSA) <david.rios@dot.gov>
Subject: JJ Keller Tank Inspection Form

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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.

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