

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Letter of Interpretation Request
Date: Thursday, October 23, 2025 13:00:12
Attachments: [Letter of Interpretation.pdf](#)

Good afternoon,

Please see the following interpretation request. Let us know if you need anything else.

Best,
Janaye

From: Carlos Graca <Carlos@hydro-test.com>
Sent: Monday, October 20, 2025 2:50 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>; Approvals (PHMSA) <Approvals@dot.gov>; Patrick, Eamonn (PHMSA) <eamonn.patrick@dot.gov>
Subject: Letter of Interpretation

Some people who received this message don't often get email from carlos@hydro-test.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.

Dear Sir/Madam,

My name is Carlos Graca I am requesting a Letter of **Clarification** regarding the number of times you can retest a cylinder if it fails due to equipment malfunction in accordance with 180.205(g)(5) and CGA Pamphlet C-1 section 5.7.1

Our question as follows:

- 1) Example: If I am testing a DOT 3AL-1800 cylinder. The Test Pressure is 3000psi. I test the cylinder to 3000psi and the cylinder Fails due to equipment failure. I can retest the cylinder at 100psi higher to 3100psi.
My Question is: If the cylinder fails again due to equipment failure. Can I retest it again another 100psi to 3200psi or is the cylinder condemned?

I have attached a PDF with a question
I appreciate your time.

Carlos Graca
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Email: carlos@hydro-test.com
www.hydro-test.com

Standards and Rulemaking Division
Pipeline and Hazardous Materials
Safety Administration, Attn: PHH-10
U.S. Department of Transportation
East Building 1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Repeated Tests

Dear Sir/Madam, I am requesting a Letter of Interpretation in regards to the number of times you can retest a cylinder if it fails due to equipment malfunction in accordance with 180.205(g)(5) and CGA Pamphlet C-1 section 5.7.1

Our question as follows:

Example: If I am testing a DOT 3AL-1800 cylinder. The Test Pressure is 3000psi.

I test the cylinder to 3000psi and the cylinder Fails due to equipment failure. I can retest the cylinder at 100psi higher to 3100psi.

My Question is: If the cylinder fails again at 3100psi due to equipment failure. Can I **retest** it another 100psi to 3200psi or is the cylinder condemned?

I appreciate your time

Sincerely,
Carlos Graca
Cylinder Re-Qualification Training Manager

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