

Nti, J.
25-0143

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Letter of Interpretation Request
Date: Thursday, November 6, 2025 16:14:59
Attachments: [Letter of Interpretation .pdf](#)

Good afternoon,

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

Best,
Janaye

From: Carlos Graca <Carlos@hydro-test.com>
Sent: Wednesday, November 5, 2025 2:31 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Dodd, Alice (PHMSA) <Alice.Dodd@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.](#)

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Dear Sir/Madam,

I am requesting a Letter of Interpretation in regards to Special Permit 14576. Section 7. "Safety Control Measures", b. "Requalification:" (1) Hydraulic Pressure Proof Test.

My question is:

Section 7. B. (1): States: Hydraulic Pressure Proof Test "The Pressure must be held for a minimum of 3 minutes **without a loss of pressure**". **What does that mean?** Does it mean, if you lose 1 psi the cylinder is condemned?

Thank you,

Carlos Graca
Hydro-Test Products
85 Hudson Rd
Stow, MA USA 01775
978-897-4647 ext.14
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: Special Permit 14576

Dear Sir/Madam, I am requesting a Letter of Interpretation in regards to Special Permit 14576. Section 7. "Safety Control Measures", b. "Requalification:" (1) Hydraulic Pressure Proof Test.

My question is:

Section 7. B. (1): States: Hydraulic Pressure Proof Test "The Pressure must be held for a minimum of 3 minutes **without a loss of pressure**". **What does that mean?** Does it mean, if you lose 1 psi the cylinder is condemned? Because the cylinder will continue to expand during the hold time which will look like pressure loss (But not really).

I appreciate your time

Sincerely,
Carlos Graca
Cylinder Re-Qualification Training Manager

HYDRO-TEST PRODUCTS LLC

85 Hudson Road Stow, Massachusetts 01775 USA
Tel # 800-225-9488 / 978-897-4647 Ext.14 **Fax #** 978-897-1942 **Email:**
Carlos@Hydrotest.com