



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

February 24, 2026

Mark Hammond
Linde Gas and Equipment
3625 S. Main Street
South Bend, IN 46614

Reference No. 25-0136

Dear Mr. Hammond:

This letter is in response to your October 8, 2025 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to leakage testing on cargo tanks. You perform annual visual and leakage inspections on cargo tanks containing liquefied petroleum gas (LPG) in which you apply a leak-detecting fluid to find bubbles at fittings, valves, and welds. You ask about a test and inspection form that your company uses to record requalification activity. The form includes a section to record performance of a leakage test and two boxes to indicate a “hydrostatic” or “pneumatic” test. The report contains an additional section to indicate performance of a leakage test which includes fields to indicate the fluid used and pressure during a leakage test. Specifically, you ask whether you should leave both the hydrostatic or pneumatic boxes blank and instead fill out the second leakage test portion of the form with LPG listed as the test medium (*i.e.*, the fluid used).

The HMR neither requires use of a particular form nor specifies a format. Therefore, this Office cannot provide specific instructions regarding how to fill out the proprietary form you provided and described in your letter. You need only record and maintain a report of tests or inspections in accordance with § 180.417(b).

However, it is the opinion of this Office that not selecting either “hydrostatic” or “pneumatic” when recording a leakage test is appropriate. Pneumatic and hydrostatic tests are “pressure tests” as specified in 49 CFR 180.407(g). The inspection method you described conforms to the “leakage test” outlined in 49 CFR § 180.407(h), therefore you should only record the completion of a leakage test. Furthermore, this Office suggests that the second portion of the form should also remain blank unless you are providing information related to

Environmental Protection Agency (EPA) Method 27 Vapor Tightness Test (K-EPA27).

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen". The signature is fluid and cursive, with a prominent initial "D".

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

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 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 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

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

[More](#)

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

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) <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

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 <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

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 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.

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.

TANKER TEST AND INSPECTION REPORT

For compliance with 49 CFR 180.407(h)(4), 180.417(b) & (c), and 40 CFR 60.505(b)

| | | | | | |
|---|--|---|--|---------------------------|--|
| TANK IDENTIFICATION NO. | | INSPECTION TEST DATE | | REPORT NUMBER | |
| OWNER CARRIER (if other than owner) | | | | | |
| PRINCIPAL PLACE OF BUSINESS ADDRESS | | | | | |
| CITY, STATE, ZIP CODE | | TELEPHONE | | TELEPHONE | |
| OWNER'S TANK SERIAL NO. | | MFG. DATE | | VESSEL MATERIAL SPEC. NO. | |
| CARGO TANK MOTOR VEHICLE MFG. | | CARGO TANK MOTOR VEHICLE CERT. DATE | | | |
| MAX. WEIGHT OF LADING | | LINING MATERIALS | | | |
| LBS. | | DESIGN PRESSURE (PSIG) | | DESIGN TEMPERATURE °F | |
| HEATING SYSTEM | | MATERIAL | | | |
| SHELL | | HEAD | | | |
| EXPOSED SURFACE AREA IN SQ. FT. | | MAX. DESIGN DENSITY OF LADING (LBS. PER GAL.) | | | |
| TYPE OF TEST(S) | | | | | |
| <input type="checkbox"/> EXTERNAL VISUAL (V) <input type="checkbox"/> LEAKAGE TEST (K) <input type="checkbox"/> PRESSURE RETEST (P) <input type="checkbox"/> INTERNAL VISUAL (I) <input type="checkbox"/> HYDROSTATIC <input type="checkbox"/> PNEUMATIC <input type="checkbox"/> HYDROSTATIC <input type="checkbox"/> LINING INSPECTION (L) <input type="checkbox"/> DELIVERY HOSE/PIPING <input type="checkbox"/> PNEUMATIC <input type="checkbox"/> THICKNESS TEST (T) <input type="checkbox"/> K-EPA27 | | | | | |

| ITEMS INSPECTED OR TESTED | | | | | | | | | |
|--|----|-----------------------------------|-----|----|---|---------------------------|------|--------|------|
| YES | NO | ITEM | YES | NO | ITEM | TYPE | MIN. | TESTED | MFG. |
| | | Tank Shell | | | Frangible (Rupture) Disk | PRESSURE | | | |
| | | Tank Heads | | | Major Appurtenances | RELIEF | | | |
| | | Head-to-Shell Seam | | | - upper coupler assembly | DEVICES | | | |
| | | Valves | | | - suspension system attachments | | 1 | 2 | 3 |
| | | Gaskets | | | - connecting structures | | 4 | 5 | |
| | | Manhole Covers | | | Lining Material | | | | |
| | | Manhole Gaskets | | | Pressure Bearing Portions of Heating System | | | | |
| | | Devices for Tightening Manhole | | | Flues for Heating System | | | | |
| | | Gaskets on Full Opening Rear Head | | | Corroded or Abraded Areas | | | | |
| | | Self-closing Stop-valves | | | Distortions | | | | |
| | | Excess Flow Valves | | | Dents | | | | |
| | | Remote Closure Devices | | | Welds | | | | |
| | | Reclosing Pressure Relief Valves | | | | | | | |
| | | Nuts and Bolts | | | | | | | |
| | | DELIVERY HOSE/PIPING | | | | THICKNESS (INCHES) | | | |
| HOSE I.D. NO. | | DATE OF ORIG. HOSE ASSEMBLY TEST | | | | HEAD | | | |
| CONDITION OF HOSE ASSEMBLY & PIPING SYSTEM | | | | | | SHELL TOP | | | |
| | | | | | | SHELL SIDE | | | |
| | | | | | | SHELL BOTTOM | | | |

(CHECK ONE) NO DEFECT OR DAMAGE DISCOVERED DEFECTS OR DAMAGE DISCOVERED

LOCATION OF DEFECTS OR DAMAGE: weld heat-affected zone liquid phase vapor phase head-to-shell seam delivery hose/piping appurtenances

Explain:

NATURE AND SEVERITY:

METHOD OF REPAIRS: IS REPAIR CERTIFICATION REQUIRED? YES NO DESIGN CERTIFYING ENGINEER REGISTRATION NO. _____

THIS UNIT HAS HAULED ANHYDROUS AMMONIA ANY OTHER MATERIAL THAT MAY CAUSE STRESS CORROSION CRACKING STRESS RELIEVED AFTER FABRICATION YES NO REPAIR DATE

DOT REGISTRATION NUMBER OF THE TESTING FACILITY/PERSON TEST DATE STRESS RELIEVED AFTER REPAIR YES (Full Local) NO ASME OR NATIONAL BOARD NO. OF REPAIR FACILITY

TESTED BY (Person's Name) REPAIRED BY

ADDRESS ADDRESS

CITY, STATE, ZIP CITY, STATE, ZIP

CARGO TANK: MEETS FAILS TO MEET THE REQUIREMENTS OF THE DOT SPECIFICATIONS IDENTIFIED ON THIS REPORT

DISPOSITION OF CARGO TANK: WITHDRAWN FROM SERVICE RETURNED TO SERVICE MARKINGS APPLIED: YES NO

SIGNATURE OF INSPECTOR / TESTER DOT REGISTRATION NUMBER DATE SIGNATURE OF OWNER DATE