



Cardez, E.
26-0045

Fwd: Clarification Request – Recordkeeping for Cylinders Removed From Service

1 message

DerKinderen, Dirk <dirk.derkinderen@dot.gov>
To: "Baker, Yul (PHMSA)" <yul.baker@dot.gov>
Cc: "Pollack, Arthur (PHMSA)" <arthur.pollack@dot.gov>

Mon, Apr 6, 2026 at 3:07 PM

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From: **Claudia Bonucchi - MAKEEN Energy** <CNB@makeenenergy.com>
Date: Mon, Apr 6, 2026 at 3:03 PM
Subject: Clarification Request – Recordkeeping for Cylinders Removed From Service
To: INFOCNTR.INFOCNTR@dot.gov <INFOCNTR.INFOCNTR@dot.gov>, Dirk.DerKinderen@dot.gov
<Dirk.DerKinderen@dot.gov>

Hello,

I am writing to request clarification regarding when we are required to document cylinders that are determined to be not fit for continued service or designated as scrap.

We operate a cylinder refurbishing facility with multiple work cells in our process. During the initial inspection stage, if a cylinder is identified as not suitable to continue through the refurbishing process, it is removed from the service flow and transferred to a designated area for condemnation or scrap.

Currently, we record all cylinders that are condemned. However, after reviewing the guidance in the reference linked below, I would like to confirm whether this level of recordkeeping is required in all cases.

Specifically, when we are the owner of the cylinder and have already determined that it is not suitable for continued service, are we required to formally record the cylinder as condemned under the requalification or visual inspection recordkeeping requirements?

Thank you for your time and clarification. Please let me know if additional information is needed.

[24-0033R | PHMSA](#)

Best regards

Claudia Bonucchi
QHSE & Compliance Manager

MAKEEN Energy USA, Inc.

4/6/26, 4:18 PM

USDOT Mail - Fwd: Clarification Request – Recordkeeping for Cylinders Removed From Service

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Thanks,

Dirk Der Kinderen
Chief

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