



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 22, 2026

Myles TenBroeck
President
American Cylinder and Safety, LLC
P.O. Box 84
Traverse City, MI 49685

Reference No. 26-0032

Dear Mr. TenBroeck:

This letter is in response to your March 9, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the inspection and requalification of compressed gas cylinders that are dual marked with both U.S. Department of Transportation (DOT) specification markings and United Nations (UN) pressure receptacle markings manufactured in accordance with International Organization for Standardization (ISO) standards. You explain that for some dual marked cylinders, the visual inspection or requalification requirements, or both, may differ depending on the applicable standard. In addition, the service life of certain composite cylinders may vary depending on the standard. Therefore, you seek clarification on how a person should manage cylinders that bear both DOT and UN/ISO markings.

We have paraphrased and answered your questions as follows:

- Q1. When a cylinder is dual marked with both DOT and UN/ISO markings, which standard takes precedence for inspections and requalification?
- A1. A dual-marked cylinder must be maintained and requalified in accordance with the applicable requirements associated with each marking, as authorized with the HMR. The regulations do not establish an order of precedence; instead, the cylinder must comply with the applicable requalification provisions for its maintenance and authorized use.
- Q2. If there is no precedence for which standard the cylinder is inspected or tested to, is documentation required on which standard was applied and the reason why that standard was chosen?

A2. No. Requalification must be performed using an authorized method applicable to the cylinder, and the requalifier must maintain required records and markings identifying the method used and the results. The HMR do not require documentation of a “choice” between standards or justification for selecting one standard over another; however, the method applied must be appropriate for the cylinder and must be compliant with applicable regulatory requirements. Please note that any marking that could misrepresent the cylinder as meeting a different specification or standard should be removed, covered, or otherwise obliterated to prevent confusion or misinterpretation.

Q3. If there is a precedence for which standard takes priority, where is this referenced in the HMR, in CGA pamphlets, or ISO guidelines?

A3. See answer A1.

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', written in a cursive style.

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



Baker, Y.
26-0032

Fwd: Resubmitting - Request for a letter of Interpretation

1 message

INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov>

Mon, Mar 9, 2026 at 12:06 PM

To: "Baker, Yul (PHMSA)" <yul.baker@dot.gov>, Hazmat Interps <hazmatinterps@dot.gov>

Good afternoon,

Please see the below interpretation request.

Let us know if you need anything,

Janaye

----- Forwarded message -----

From: **Myles TenBroeck** <tanktest@gmail.com>

Date: Sat, Mar 7, 2026 at 11:23 AM

Subject: Resubmitting - Request for a letter of Interpretation

To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Re Submitting the request for the Letter of Interpretation submitted on 19 Feb 2026

Good Morning,

I am requesting clarification and a letter of interpretation in regards to inspections and requalification of compressed gas cylinders which are dual marked with both US DOT and UN-ISO markings. With some of these dual marked cylinders, the visual inspection and/or requalification requirements are in conflict with each other. Additionally, the service life of some composite cylinders may differ depending on the standard.

Question 1. When a cylinder is dual marked with both US DOT and UN ISO Markings, which standard takes precedence for inspections and requalification?

Question 2. If there is no precedence for which standard the cylinder is inspected to/tested to, is any documentation required on which standard was chosen and why?

Question 3. If there is a precedence for which standards take priority, where is this referenced in 49CFR/CGA Pams/ISO Pams?

Point of Contact:

Name: Myles TenBroeck

Company: American Cylinder and Safety, LLC

Mailing Address: PO Box 84, Traverse City, MI 49685

Phone Number: (808)343-6594

Email Address: tanktest@gmail.com

Myles.tenbroeck@gmail.com

Your clarification of this is greatly appreciated.

Myles L. TenBroeck

President American Cylinder and Safety

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HAZMAT Training and Equipment for members of the compressed gas industry.