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Mr. Kelley, I would like a Formal Interpretation of 49 CFR 180.205(g)(5). System Malfunction.

The question that I have relates to system malfunction or operator error. 49 CFR 180.205(g)(5) states that, in case of a malfunction of the test equipment or operator error, the test equipment may be repeated in accordance with CGA C-1 section 5.7.1.

CGA C-1 5.7.1 states – if the actual test pressure achieved 90% to 100% of the minimum test pressure, the test shall be repeated at an increased pressure of 10% or 100 psi greater than the minimum test pressure, whichever is less. Then gives 2 examples, one for 2400 psi (increasing 100 psi) and one for 260 psi (increasing 10%).

CGA C-1 7 – Proof pressure method

CGA C-1 7.1.2 states – In case of a malfunction of the test equipment or operator error, the test may be repeated. There is no need to increase the pressure of a repeat test.

**The question is** – Does the pressure need to be increased by 10% for the retest due a system malfunction or operator error while performing a Proof Pressure test?

Thank you for any information that you can give me. Brick Keltner, Koorsen Fire & Security