



Gale, Tony &lt;tony.gale@dot.gov&gt;

## Fwd: Clarification Request – Incident Reporting Threshold under DOT-SP 20425

1 message

**Yoder, Kimberly** <kimberly.yoder@dot.gov>  
To: "Gale, Tony (PHMSA)" <tony.gale@dot.gov>

Tue, Jun 2, 2026 at 11:56 AM

As per your request here is the original email for submitting for a formal interpretation.

Regards,



Kimberly G. Yoder  
Director  
Office of Hazmat Safety/National Programs  
Pipeline Hazardous Materials Safety Administration  
U.S. Department of Transportation  
(404)290-6931  
[kimberly.yoder@dot.gov](mailto:kimberly.yoder@dot.gov)

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

From: **Jacob Ewing** <[jewing@gohydria.com](mailto:jewing@gohydria.com)>  
Date: Mon, Mar 2, 2026 at 3:03 PM  
Subject: Clarification Request – Incident Reporting Threshold under DOT-SP 20425  
To: Kimberly Yoder <[kimberly.yoder@dot.gov](mailto:kimberly.yoder@dot.gov)>  
Cc: George Antoniou <[gantoniou@gohydria.com](mailto:gantoniou@gohydria.com)>, Lundgren, Craig (PHMSA) <[craig.lundgren@dot.gov](mailto:craig.lundgren@dot.gov)>

Happy Monday Kimberly,

I hope you are doing well.

We are seeking clarification regarding the incident reporting expectations under DOT-SP 20425 (5th Revision). Section 12 of the Special Permit references the Hazardous Materials Incident Reporting requirements under 49 CFR §§ 171.15 and 171.16 and states that the grantee must notify the Associate Administrator in writing of any incident involving a package, shipment, or operation conducted under the terms of the permit.

To ensure full compliance, we would appreciate guidance on what PHMSA considers to constitute a reportable “incident” in the context of our tube trailer modules, associated structural framing, and related components operating under this Special Permit.

Specifically, we are seeking clarification on scenarios such as:

- A leaking cylinder valve seat resulting in “leak-by” that pressurizes the downstream manifold.
- Leakage at a quick-connect fitting during loading or unloading operations.
- Minor manifold leakage identified during pre-trip, pre-fill, or post-fill inspections.
- Failed O-rings or valve components detected during normal operations or inspection.
- Frame cracks or structural member cracking within the module assembly.

- Chassis cracking or structural issues identified during inspection or maintenance.

In high-pressure gas systems, minor component leakage or mechanical deficiencies may occasionally occur and are often identified through routine inspection, maintenance, or monitoring processes. These conditions may require repair or component replacement.

Our objective is to clearly distinguish between:

1. Conditions that should be documented and addressed internally through maintenance and corrective action procedures; and
2. Conditions that rise to the level of immediate notice under 49 CFR § 171.15, written incident reporting under 49 CFR § 171.16, and/or written notification to OHMS pursuant to the Special Permit.

We want to ensure that our internal SOPs align fully with PHMSA's expectations and that we are appropriately reporting events that meet the regulatory threshold, while not misclassifying routine maintenance findings as transportation safety incidents.

Thank you for your guidance.



**Jacob Ewing**  
Hydria Gas Technologies




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