



Horne, T.
26-0063

Fwd: Letter of Interpretation Request

1 message

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

Wed, May 13, 2026 at 3:20 PM

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

Good afternoon,

Please see the following interpretation request.

Let us know if you need anything,

Janaye

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

From: yfuchigami@jcct.co.jp <yfuchigami@jcct.co.jp>

Date: Wed, May 13, 2026 at 3:07 AM

Subject: Letter of Interpretation Request

To: infocntr@dot.gov <infocntr@dot.gov>

Cc: tfukushima@jcct.co.jp <tfukushima@jcct.co.jp>, Takashi <tshiomi@jcct.co.jp> <tshiomi@jcct.co.jp>

To Whom It May Concern,

I am writing to request clarification regarding the requirements of 49 CFR §173.301(f).

Our customer is currently considering a PRD for a DOT xenon gas cylinder (approximately 1450 psi) used in a satellite thruster system. The thruster system, including the cylinder, is planned to be transported to a rocket launch site within the United States.

According to 49 CFR §173.301(f), cylinders filled with gas and transported within the U.S. are required to be equipped with a PRD tested in accordance with CGA S-1.1.

In addition, based on Table 3 of CGA S-1.1, either a CG-1 (RD) or CG-7 (PRV) device may be used for xenon gas cylinders.

In our customer's case, they are considering the use of a CG-1 (RD) device as the primary PRD because the cylinder pressure is approximately 1450 psi, and a CG-7 device does not meet the applicable requirements under this condition. In addition, due to redundancy requirements from the rocket company, the customer is planning to install an RD (CG-1) and a PRV in series.

We would appreciate your guidance regarding the following questions:

Q1: In this configuration, is it sufficient that only the CG-1 PRD (RD) complies with CGA S-1.1, or is the additional PRV also required to comply with CGA S-1.1?

Q2: If the additional PRV is also required to comply with CGA S-1.1, under which CGA classification should this valve be categorized (e.g., CG-7, CG-8, CG-11, or another classification)?

We would appreciate any clarification you can provide regarding these points.

Sincerely,

☾ ☆ = = = = =

Yuzuki Fuchigami
Japan Controls Co., Inc.
E-Mail: yfuchigami@jcct.co.jp
TEL 080-4861-9139

〒107-0052
[1-7-19, Akasaka, Minato-ku, Tokyo](#)
TEL (03) 3584-4251 FAX (03) 3585-9603
= = = = = ☆ ☽