



June 16, 2026

Chief
Office of Hazardous Materials Standards
Regulatory Review and Reinvention
400 7th Street S.W.
Washington, D.C. 20590

Subject: Request for written interpretation on CGA pamphlets under S171.7n(6)

Please provide a written interpretation for the above reference as it pertains to cylinder re-qualifiers.

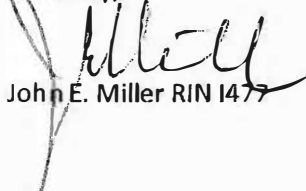
I have recently been told by the enforcement group that the current CGA C-6.2 Eighth Edition 2019 is not valid, since the inside cover does not list the CGA C6.2 THIRD EDITION 1996 version as incorporated in the current version. Therefore we must have the 1996 version on hand per S171.7n(6). This has never been an issue in the past. Other CGA pamphlets inside cover lists previous versions as incorporated.

I am requesting a written response to these questions:

- 1) Is it acceptable to have the latest editions of the CGA C6.2 EIGHTH EDITION 2019 pamphlets in place of the cited edition of CFR 49, Section 171.7n(6) when we have the current version of CGA C-6.2?
- 2) Should DOT inspectors and enforcement inspectors be allowed to demand or suggest that the facility must have the CGA C6.2 THIRD EDITION 1996 version on hand if the facility has the current CGA C6.2 EIGHTH EDITION 2019 even though CGA does not reference it as they do other pamphlets?

Thank you in advance for your attention to this request.

Sincerely,



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