



26-0087
Casey

Fwd: Request for Letter of Interpretation - Tanner Industries, Inc.

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

Fri, Jun 26, 2026 at 2:17 PM

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

Good afternoon,

Please see the attached interpretation request.

Let us know if you need anything,

Janaye

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

From: **James Klucsarits** <jkluksarits@tannerind.com>

Date: Thu, Jun 25, 2026 at 4:02 PM

Subject: Request for Letter of Interpretation - Tanner Industries, Inc.

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

To Whom It May Concern,

Please find attached a Request for Letter of Interpretation submitted on behalf of Tanner Industries, Inc., pursuant to 49 CFR § 105.20.

This request seeks a formal written interpretation regarding whether external visual inspection, conducted in accordance with CGA Pamphlet C-6, may serve as an adequate alternative requalification method under 49 CFR § 180.207(d) for ISO 4706:2008 welded steel UN pressure receptacles used exclusively for anhydrous ammonia (UN1005), minimum 99.95% purity, service.

This request is submitted at the recommendation of PHMSA Transportation Specialist Kenneth Clark (PHH-30), who reviewed Tanner Industries' approval application under 49 CFR § 107.705 and § 180.207(d) and directed that a formal Letter of Interpretation be sought from the Standards Division for further regulatory clarification.

The following document is attached:

- Request for Letter of Interpretation — Tanner Industries, Inc.

Please confirm receipt of this request and advise if any additional information is required. I can be reached at 215-322-1238 or jklucsarits@tannerind.com.

Thank you for your consideration.

Respectfully submitted,

James Klucsarits

Manager of Quality and Regulatory Affairs

Tanner Industries, Inc.

(O) (215)-322-1238 ext: 2240

(F) (215)-526-7829

jklucsarits@tannerind.com



Request for Letter of Interpretation — Tanner Industries, Inc..pdf
184K

James Klucsarits
Manager of Quality & Regulatory Affairs
Tanner Industries, Inc.
735 Davisville Road
Southampton, PA 18966
215-322-1238
jklucsarits@tannerind.com

June 25, 2026

Hazardous Materials Information Center (HMIC)
Office of Hazardous Materials Safety
Standards and Rulemaking Division
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Submitted electronically to: infocntr@dot.gov

Re: Request for Letter of Interpretation — Adequacy of External Visual Inspection as a Requalification Method Under 49 CFR § 180.207(d) for ISO 4706:2008 Welded Steel UN Pressure Receptacles Dedicated to Anhydrous Ammonia (UN1005) Service

Dear Sir or Madam:

I. Purpose of Request

Pursuant to 49 CFR § 105.20, Tanner Industries, Inc. respectfully requests a formal written letter of interpretation from the Office of Hazardous Materials Safety regarding whether external visual inspection, conducted in accordance with CGA Pamphlet C-6 (Standards for Visual Inspection of Steel Compressed Gas Cylinders), may serve as an adequate alternative requalification method, under 49 CFR § 180.207(d), for ISO 4706:2008 welded steel UN pressure receptacles used exclusively for anhydrous ammonia (UN1005), minimum 99.95% purity, service.

II. Background

Tanner Industries, Inc. is an anhydrous ammonia distributor that had submitted an application for approval under 49 CFR § 107.705 and § 180.207(d), seeking authorization to requalify ISO 4706 welded steel UN pressure receptacles by external visual inspection on a 5-year interval in lieu of the 10-year hydraulic retest otherwise required under § 180.207.

In the course of reviewing that application, PHMSA staff (Transportation Specialist Kenneth Clark) advised that *“the technical requirements regarding this determination are detailed in the UN ISO 4706 standard, specifically within clauses 7 through 10,”* and recommended that Tanner Industries seek a formal Letter of Interpretation from the Standards Division for further clarification. This request is submitted in response to that recommendation.

III. The Technical Question Presented by Staff Guidance

ISO 4706:2008, Clauses 7 through 10, govern: (7) calculation of minimum wall thickness; (8) construction and workmanship, including welded joint configuration and quality; (9) testing, including mechanical (tensile and bend) testing, hydraulic pressure testing, burst testing, and radiographic examination of welds; and (10) acceptance criteria for batch testing and sampling at the time of manufacture.

Tanner Industries understands PHMSA staff’s reference to Clauses 7–10 to reflect the observation that these clauses govern design, construction, and one-time batch acceptance testing performed at the time of manufacture, and that ISO 4706 does not itself prescribe a periodic in-service inspection or requalification protocol. Tanner Industries requests PHMSA’s confirmation as to whether this observation is the basis for any determination that external visual inspection is technically inadequate as an in-service requalification method for these cylinders, and if so, the specific technical or safety basis for that conclusion.

Tanner Industries notes, for PHMSA’s consideration, that 49 CFR Part 178 (governing DOT specification cylinder manufacture) similarly does not address in-service visual inspection procedures; that subject is instead addressed by 49 CFR Part 180 and by CGA Pamphlet C-6, both of which sit outside the manufacturing specification itself. Tanner Industries respectfully submits that ISO 4706’s scope, which is limited to design, construction, and manufacturing acceptance, reflects the same structural division between manufacturing standards and in-service inspection standards found in the DOT framework — and does not indicate that visual inspection is technically unsuited to cylinders of this construction.

Tanner Industries further notes that 49 CFR § 180.207(d) prescribes specific ISO requalification standards for seamless steel (ISO 6406), seamless aluminum (ISO 10461), dissolved acetylene (ISO 10462), composite (ISO 11623), and adsorbed gas (ISO 11513) UN pressure receptacles, but does not reference a requalification standard for welded steel UN pressure receptacles manufactured to ISO 4706. This absence of a prescribed requalification standard for ISO 4706 welded steel cylinders in § 180.207(d) appears to reflect a regulatory gap. Tanner Industries respectfully submits that the approval pathway under § 180.207(d) — which expressly authorizes the Associate Administrator to approve alternative requalification methods and procedures — is the appropriate mechanism to address that gap, including by establishing an appropriate requalification method for these cylinders in dedicated anhydrous ammonia service.

IV. Questions Presented

Tanner Industries respectfully requests PHMSA's written interpretation of the following questions:

1. Does the fact that ISO 4706:2008 does not itself prescribe an in-service visual inspection protocol preclude approval of external visual inspection as an alternative requalification method under 49 CFR § 180.207(d)?
2. What specific technical characteristics of cylinder design, construction, or material evaluated under ISO 4706 Clauses 7 through 10 are relevant to determining whether external visual inspection can reliably detect in-service degradation (e.g., corrosion, mechanical damage, weld deterioration) over a 5-year service interval?
3. Does PHMSA's existing authorization of 5-year visual requalification for DOT-specification cylinders dedicated to anhydrous ammonia service under 49 CFR § 180.209(g) inform whether comparable treatment may be extended to ISO 4706 UN pressure receptacles in materially identical dedicated service, via approval under § 180.207(d)?

V. Additional Information

The ISO 4706 cylinders at issue are manufactured by AMTROL-ALFA Metalomecânica, S.A. (Portugal) and are supported by Type Approval Certificate No. 298057/TA/01 (issued by SGS United Kingdom Ltd.) and batch-level acceptance certification, mechanical testing, hydrostatic/burst testing, and radiographic weld examination performed in accordance with ISO 4706:2008. These cylinders will be used exclusively for anhydrous ammonia (UN1005), minimum 99.95% purity, service, will be protected externally by a corrosion-resistant coating, and will be commercially free from corroding components. Tanner Industries can provide complete manufacturer documentation for PHMSA's review upon request.

We understand that this request, once processed, may be posted publicly on PHMSA's pending interpretations page for a 30-day public comment period, and that requests should be submitted at least 120 days before a response is needed. We are prepared to provide any additional information PHMSA may require.

Thank you for your consideration of this request.

Respectfully submitted,



James Klucsarits
Manager of Quality & Regulatory Affairs
Tanner Industries, Inc.