



26-0088
Horne

Letter of Interpretation Request

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

Fri, Jun 26, 2026 at 4:39 PM

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

Good afternoon,

Please see the below interpretation request.

We're awaiting the requestor's mailing address but will send that over once we receive it.

Thanks,

Janaye

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

From: **Kaltz Li** <KALTZ.LI@haeco.com>

Date: Thu, Jun 25, 2026 at 11:11 AM

Subject: Request for Compliance Interpretation – 49 CFR §180.215(a)(6) "Current Copies at That Station" (RIN C860)

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

Dear Sir/Madam,

We would like to respectfully request clarification regarding the interpretation and acceptable means of compliance with **49 CFR §180.215(a)(6)**, specifically the requirement stating that "current copies [of applicable specifications] must be available at that station."

This enquiry is raised in the context of our **DOT-approved cylinder requalification facility (RIN C860)** operated by **HAECO Component Overhaul**.

Currently, our compliance approach is as follows:

- A complete set of **official hard-copy publications** (as referenced in 49 CFR §171.7, including applicable CGA publications and PHMSA Special Permits) is **maintained at the test station**.
- We perform a **monthly verification** against the CGA and PHMSA (e.g., Special Permit) websites to ensure that the hard copies retained are **current and up to date**.

However, an alternative internal interpretation has been proposed, suggesting that:

- Maintaining **controlled electronic (softcopy) versions** of the referenced documents, accessible at the test station, would be **sufficient to meet the requirement** for "current copies at that station," without retaining physical hard copies.

In light of the above, we respectfully seek PHMSA's interpretation on the following:

1. Does §180.215(a)(6) require the physical presence of **hard-copy documents**, or are **controlled electronic copies** (readily accessible at the station) acceptable for compliance?
2. If electronic copies are acceptable, what are PHMSA's expectations regarding:
 - Document control and revision management,

- Accessibility at the point of use,
- Demonstration of document “currency” during inspections or audits?

3. Where an electronic document system ensures up-to-date versions, would periodic manual verification (e.g., monthly checks) still be expected or necessary?

We seek to ensure that our practices under **RIN C860 approval** remain fully aligned with PHMSA regulatory intent and compliance expectations.

We appreciate your guidance and would be pleased to provide any further details if required.

Yours sincerely,

Kaltz Li

Head of Operation

Component Repair & Overhaul

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