

**Casey, C**
26-0094

Letter of Interpretation Request

1 message

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

Tue, Jul 14, 2026 at 4:15 PM

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

Good afternoon,

Please see the below interpretation request.

The mailing address is:

PO Box 48 / 49 Damron Road

Bangor, CA 95914

Let us know if you need anything,

Janaye

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

From: **Dahl, Gregory** <GXDT@pge.com>

Date: Tue, Jul 14, 2026 at 10:01 AM

Subject: Request for interpretation: Relief valve recertification and MC-338 LNG cargo tank installation within 6 months

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

Cc: Dahl, Gregory <GXDT@pge.com>

Classification: Public

Dear PHMSA Hazardous Materials Information Center,

Subject: Request for interpretation: Relief valve recertification and MC-338 LNG cargo tank installation within 6 months

I am requesting a written interpretation regarding the applicability of the six-month storage allowance described in PHMSA's March 26, 2014 letter (Ref. No. 13-0202) to relief valves intended for installation on highway MC-338 LNG cargo tanks.

Background: PHMSA letter Ref. No. 13-0202 (Mar 26, 2014) states that for tank cars under §180.515(c) a reclosing pressure relief device that “passes the pressure test,” is “protected from deterioration,” and is installed within six months of that test may be marked on the tank with the installation date rather than the original test date.

I am preparing to install a set of pretested relief valves (FEB 2026) on an MC-338 DOT highway LNG cargo tank.

- Tanker 100-96 had a 60-month due MAR 2026. Which requires...
 - Pneumatic test and required periodic tests (external visual)
 - relief valves requalification
- Relief valves to be installed were Tested on FEB 2026.
- The Register DOT cargo tank test/inspection facility with qualified inspectors could not perform the P inspection and relief valve installation until JUNE 2026.
- Tanker was taken out of service (OOS) on March 31, 2026.
- An in-service form was completed July 10, 2026, to bring the unit back into service after...
 - P inspection and required periodic tests were completed in JUNE 2026 and paperwork received
 - This includes the relief valve installation record for relief valves tested in February 2026

- May I use the new rolling date JUNE 2026 to start the next five-year requalification cycle for the P inspection and the relief valve even though the relief valve was tested in FEB 2026?

Thank you in advance for your response!

Greg

Greg Dahl

Pacific Gas & Electric Company

530-790-5188

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