



Baker, Y.
26-0059

Fwd: "Letter OF Interpretation Request"

1 message

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

Mon, May 11, 2026 at 2:45 PM

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

Good afternoon,

Please see the letter of interpretation request below. Let us know if you need anything else.

Best,

Janaye

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

From: **Matt Buys** <matt_hydrostat@yahoo.com>

Date: Mon, May 11, 2026 at 9:34 AM

Subject: "Letter OF Interpretation Request"

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

My name is Matthew Buys I'm the divisional manager for Hydro Stat LLC.

We are a DOT licensed hydrostatic cylinder recertifying facility located in Holly Michigan.

I'm looking to get an approval to use a Pulse Laser Cleaning Machine as an alternative to shot blasting to remove clear coat and paint from aluminum and steel high pressure gas cylinders for refurbishing purposes.

The manufacture Catalina stated that this is a recommended and approved method for this service but it's not in the CGA or CFR. So I'm requesting a letter of interpretation please.

The machine I'm currently looking at is a hand operated, air cooled class 4 Pulse Laser Cleaning Machine (SFX Model APC 500 IOT) that produces zero damage to the substrate surface. The light source is soft and controllable and non destructive. The laser vaporizes the clear coat and or paint from the surface of an aluminum or steel cylinder without any surface damage to the cylinder itself. The vapor created during the process gets collected in a separate vapor extraction filtered machine. I feel this would be much safer and faster method then shot blasting.

Matthew Buys - Divisional Manager

Hydro Stat LLC

P.O.Box 510 Warren, MI 48015 (mailing address)

[203 John St Holly, MI 48442](#) (physical address)

PH:586-755-2460

Cell: 810-293-2775

SFX Air Cooled Laser Cleaner Technical Specifications:

- Model: APC-500(IOT)
- Laser Power: 200W 300W 500W
- Laser Wavelength: 1070±10nm
- Operation Mode: Pulse
- Pulse Width: 100-500ns
- Modulation Frequency: 1-3000KHz
- Laser Fiber Length: 5m (Customizable)
- Scanning Width: 0-100mm

- Input Voltage: AC110~220V±10%
- Input Power: 1.5KW 2KW 1.5KW 2KW
- Cooling Method: Air Cooling
- Ambient Temperature: -5°C~37°C
- Ambient Humidity: 40%-80%
- Machine Size: 580*430*630mm
- Packaging Size: 700*500*770mm
- Net Weight: ≤55kg, ≤54kg, ≤57kg, ≤56kg
- Gross Weight: ≤70kg, ≤73kg, ≤72kg



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

July 23, 2026

Matthew Buys
Divisional Manager
Hydro Stat, LLC
P.O. Box 510
Warren, MI 48015

Reference No. 26-0059

Dear Mr. Buys:

This letter is in response to your May 11, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the removal of paint or loose material from cylinders under § 180.205(f)(6). Your email discusses the use of a pulse laser cleaning machine as an authorized alternative to shot blasting for the removal of clearcoat and paint from aluminum and steel high-pressure gas cylinders. You add that the use of pulse laser cleaning machines are not specifically mentioned in the HMR or any Compressed Gas Association (CGA) publications for visual inspection of steel and aluminum cylinders. Specifically, you ask whether a device that relies on a laser to remove clear coat and paint may be used for the preparation and cleaning of a cylinder for inspection in accordance § 180.205(f)(6) of the HMR.

Yes. Neither the HMR nor the CGA standards for visual inspection of steel and aluminum cylinders restrict specific devices for removing paint or loose material. While shot blasting is mentioned in § 180.205(f)(6), it is meant to be an example, and not a limitation to using other methods. Note that cleaning methods that could remove cylinder material and reduce wall thickness are not permitted under this section.

Please also note that any evidence of the removal of wall thickness via grinding, sanding, or other means, except in association with an authorized repair (*see* § 180.205(d)(4)), would trigger the cylinder to require full testing and inspection under § 180.205.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen", written in a cursive style.

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division