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

1200 New Jersey Avenue, SE
Washington, DC 20590

October 13, 2026

Greg Dahl
Pacific Gas & Electric Company
49 Damron Road
PO Box 48
Bangor, CA 95914

Reference No. 26-0094

Dear Mr. Dahl:

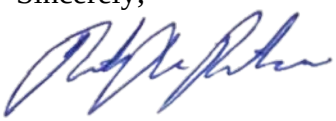
This letter is in response to your July 14, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the installation of pressure relief devices (PRDs) tested prior to when an MC 338 cargo tank motor vehicle (CTMV) is pressure tested. You describe a scenario in which a set of PRDs were tested in February 2026 for installation on a specification MC 338 CTMV. You state that the CTMV was due for its 5-year pressure test and inspection in March 2026; however, the pressure test and inspection, and PRD installation, could not be completed until June 2026. You also note that the final inspection report was completed in July 2026. Specifically, you ask whether the next requalification (retest) date is determined based on June 2026 even though the PRDs intended for installation were tested in February 2026.

Yes. The requalification (retest) date is determined from the most recent inspection or CTMV certification as outlined in § 180.407(c) such as performance of the required pressure test. The HMR do not necessarily require that PRD testing and the pressure test coincide. Only that when performing the pressure test of a cargo tank all self-closing PRDs must be removed and inspected and those not tested or failing tests must be repaired or replaced (see § 180.407(g)(1)).

Thus, in accordance with § 180.415, the cargo tank must be marked with the date (month and year) the pressure test was performed.

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

Sincerely,



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

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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