



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

FEB 05 2018

Ray Denny
Engineering Manager
Catalina Composites
11700 Monarch Street
Garden Grove, CA 92841

Reference No. 17-0107

Dear Mr. Denny:

This letter is in response to your October 2, 2017, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the design and construction requirements for UN composite cylinders. Specifically, you refer to part 8.5.10.2 of ISO 11119-2(E), Gas cylinders—Gas cylinders of composite construction—Specification and test methods—Part 2. You ask if a cylinder can be fitted with any authorized pressure relief device (PRD) and valve combination, if it passed the test in 8.5.10.2(b).

The answer is yes, provided the service equipment meets the requirements of § 178.71(d). The test requirement you reference in ISO 11119-2(E) is for the cylinder itself, not the service equipment.

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

Ciccarone
§ 8.5.10.2
Cylinders
17-0107

Dodd, Alice (PHMSA)

From: Patrick, Eamonn CTR (PHMSA)
Sent: Tuesday, October 03, 2017 2:38 PM
To: Hazmat Interps
Cc: Dodd, Alice (PHMSA); January, Ikeya CTR (PHMSA)
Subject: FW: Request for Letter of Interpretation - ISO 11119-2:2012 Section 8.5.10.2

Hi Alice/Ikeya,
Please submit this as a letter of interpretation. Let me know if you have any questions.
Thanks!

Eamonn

From: Ray Denny [mailto:RDenny@catalinacomposites.com]
Sent: Monday, October 02, 2017 12:53 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Request for Letter of Interpretation - ISO 11119-2:2012 Section 8.5.10.2

To whom it may concern,
I am writing to request a letter of interpretation from the DOT concerning a test requirement in the ISO 11119-2:2012 specification. The specific section in question is 8.5.10.2 (part of Fire Resistance Test). Based on the information given in the specification (shown below) there are two options for testing.

8.5.10.2 Procedure

Two cylinders shall be fitted with either:

- a) the valves and PRDs intended for use (if known); or
- b) a valve fitted with bursting disc set to operate at between p_n and $1.15 \times p_n$.

If the test is conducted with the PRDs and valve intended for use in service [i.e. option a)], the specification of the valve and PRDs shall be marked on the design drawing and the approval certificate.

It is our assumption that if option b) is selected then the cylinder would then be approved for any valve and PRD combination. We would like to request a letter of interpretation from the DOT on this subject. Please let me know if you need any additional information.

Thank you,

Ray Denny
Engineering Manager



Direct: 714.793.5755 **Main:** 714.894.5300
Email: rdenny@catalinacomposites.com
Website: www.catalinacomposites.com
Address: 11700 Monarch St., Garden Grove, CA 92841