



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

1200 New Jersey Avenue, SE
Washington, DC 20590

July 28, 2021

Mr. Jeffery Strong
Manager
Cylinder Sales and Testing, LLC
d/b/a Coastal Hydrotesting
7120 Golden Ring Road, Ste. 104
Baltimore, Maryland 21221

Reference No. 20-0086

Dear Mr. Strong:

This is in response to your November 3, 2020, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to hydrotesting and ultrasonic examination of foreign compressed gas cylinders. Your questions have been paraphrased and answered below.

- Q1. You ask whether International Organization for Standardization (ISO) cylinders, manufactured with a country of approval other than the United States, must be retested in accordance with the Requalification of Cylinders table found in § 180.209 or the requirements for requalification of United Nations (UN) pressure receptacles specified in § 180.207.
- A1. As discussed on page 85388 of the final rule issued under Docket No. PHMSA-2011-0140 (12/28/2020, 85 FR 85380) (HM-234) ISO cylinders with a country of approval of the United States or Canada must be tested in accordance with the test requirements in § 180.207 which specifies requirements for the requalification of UN pressure receptacles. ISO cylinders must be manufactured with a country of approval of the United States or Canada to be considered an approved package (See § 180.205(a)).
- Q2. You ask whether is it acceptable to perform an ultrasonic examination on foreign ISO cylinders (i.e., manufactured with a country of approval other than the United States or Canada) under your current retester's certification letter and your current calibration standards manufactured for UN/ISO 9809-1,2,3 USA cylinders.

A2. The answer is no. Your company's Requalifier Identification Number (RIN) H949, authorizes:

“DOT cylinder specification(s): 3A, 3AA, 3AL, UN ISO: 9809-1, 9809-2 and 9809-3 and Special Permit(s): 6557 and 14175 by the “ultrasonic” test method, in accordance with Special Permit(s): 16461, 14546 and 20831.”

PHMSA retester's certification letters authorize RIN holders testing authority for DOT approved cylinders. Your company's RIN does not specifically authorize testing UN ISO cylinders with a country of approval other than the United States or Canada.

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

Sincerely,



T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Pollack

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)
Subject: FW: Interpretation Request - Retesting Foreign UN/ISO Cylinders
Date: Monday, November 9, 2020 1:48:42 PM
Attachments: [Interpretation Request 11-3-20.docx](#)

20-0086

Hi Alice,

Please see attached for a letter of interpretation request. Jonathon had spoken with Eamonn about this situation, and Eamonn advised that whoever is assigned the letter speak with him regarding its content.

Please contact our office with any questions.

Best,

Sarah (HMIC)

From: Nickels, Matthew (PHMSA)
Sent: Tuesday, November 3, 2020 10:13 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Nickels, Matthew (PHMSA) <Matthew.Nickels@dot.gov>
Subject: FW: Interpretation Request - Retesting Foreign UN/ISO Cylinders

From: Jeff Strong <jeff.strong@cylindersalesandtesting.com>
Sent: Tuesday, November 3, 2020 9:58 AM
To: Gale, John (PHMSA) <john.gale@dot.gov>
Cc: Dave Reeves <dave.reeves@cylindersalesandtesting.com>
Subject: Interpretation Request - Retesting Foreign UN/ISO Cylinders

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning Mr. Gale,

Attached is a letter requesting an interpretation regarding the retesting of foreign UN/ISO cylinders. If I need to forward this request to anyone else within your department or if you require any additional information feel free to contact me.

Thank you,

Jeffery Strong
Manager
Cylinder Sales and Testing, LLC

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443-904-0566 (cell)

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