



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

1200 New Jersey Avenue, SE
Washington, DC 20590

June 23, 2022

Ms. Ann Fukunaga
OSM, LLC
4348 Waialae Avenue, #485
Honolulu, HI 96816

Reference No. 22-0004

Dear Ms. Fukunaga:

This letter is in response to your January 20, 2022, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the periodic testing, inspection, and repair of portable tanks. Specifically, you ask whether T75 United Nations (UN) portable tanks used for the transportation of refrigerated liquefied gases (e.g., carbon dioxide) are excepted from the pneumatic test required by the 5-year periodic inspection and test specified in § 180.605(e).

The answer is yes. As specified in § 180.605(e), portable tanks used for the transportation of refrigerated, liquefied gases are excepted from the requirement for internal inspection and the hydraulic pressure test (hydrostatic or pneumatic) during the 5-year periodic inspection and test, if the portable tanks were pressure tested to a minimum test pressure of 1.3 times the design pressure using an inert gas, as prescribed in § 178.338-16(a) and (b), before putting the portable tank into service initially, and after any exceptional inspections and tests specified in § 180.605(f).

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

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster".

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

Pollack

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: RE: 49CFR180.605 (e) Periodic inspection and test -- IA-0002
Date: Tuesday, January 25, 2022 12:42:17 PM
Attachments: [image006.png](#)
[image008.png](#)

22-0004

Hello Alice,

Please see the below interpretation request.

Let me know if you have any questions.

Regards,

-Breanna

From: OSM <osm@oceansurveys.net>
Sent: Thursday, January 20, 2022 2:28 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Fwd: RE: 49CFR180.605 (e) Periodic inspection and test -- IA-0002

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.

To Whom It May Concern;

Please see emails below, I have copied my initial inquiry (last email) again. Irwin Pascal recommended that I request a definitive answer from you and that the question may have been asked/answered previously.

Original email below:

I have an inquiry from a potential customer who has UN Portable Tanks (T75) used for the transportation of refrigerated liquefied gas (Carbon Dioxide).

49CFR180.605 (e) Periodic inspection and test -- "...Portable tanks used for the transportation of refrigerated, liquefied gases are excepted from the requirement for internal inspection and the hydraulic pressure test during the 5-year periodic inspection and test, if the portable tanks were pressure tested to a minimum test pressure of 1.3 times the design pressure using an inert gas as prescribed...before putting the portable tank into service..."

Are these tanks exempt from the 5 year, in this case, pneumatic test?

Looking forward to hearing from your as soon as possible.

Aloha,

Ann Fukunaga

IA-0002

OSM, LLC
4348 Waialae Avenue, #485
Honolulu, Hawaii 96816

Telephone: (808) 525-5000
E-mail: osm@oceansurveys.net

----- Original Message -----

Subject:RE: 49CFR180.605 (e) Periodic inspection and test -- IA-0002

Date:2022-01-20 04:12

From:"Pascal, Irwin (PHMSA)" <irwin.pascal@dot.gov>

To:"osm@oceansurveys.net" <osm@oceansurveys.net>

Cc:"Approvals (PHMSA)" <Approvals@dot.gov>

Good day Ann

I would recommend the individual send an interp request to the standards division here at PHMSA in order to obtain a definite answer. This question may have already been addressed, and if so the response time will be short. Because **in my opinion, not PHMSA's**, the site states that ".....excepted from the requirement for internal inspection and the hydraulic pressure test during the 5-year periodic inspection and test...", so that would mean to me that the 5-year periodic inspection and test would still need to be performed, except that the two items stated are exempt. You can see why an interp request is the best alternative as my opinion really does not count. I have attached the HMIC information below.

Hazardous Material Information Center (PHMSAHMInfoCenter@dot.gov)

1-800-HMR-4922
1-800-467-4922
202-366-4488
infocntr@dot.gov

Irwin Pascal *CDGP*

Transportation Specialist
Sciences and Engineering Division
Office of Hazardous Materials Safety

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration

1200 New Jersey Ave., SE

Washington, D.C. 20590-0001

Email: Irwin.pascal@dot.gov

Office: 202-366-8181 ♦ Fax: 202-366-3753

[PHMSA Home](#) | [LinkedIn](#) | [Twitter](#) | [HAZMAT](#) | [OPS](#)



From: Approvals (PHMSA) <Approvals@dot.gov>
Sent: Thursday, January 20, 2022 7:57 AM
To: Pascal, Irwin (PHMSA) <irwin.pascal@dot.gov>
Subject: FW: 49CFR180.605 (e) Periodic inspection and test -- IA-0002

Please take a look and respond to the applicant. Let me know if you need assistance.

Duane M. Cassidy

Chief, Pressure Vessels Branch (PHH-25)

Sciences and Engineering Division

Office of Hazardous Materials Safety

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration

E21-301, 1200 New Jersey Ave SE, Washington, DC 20590
Office: 202.366.5794 ◊ Mobile: 202.596.0583

[PHMSA Home](#) | [LinkedIn](#) | [Twitter](#) | [HAZMAT](#) | [OPS](#)



Know what's below.
Call before you dig.



From: OSM <osm@oceansurveys.net>
Sent: Wednesday, January 19, 2022 5:49 PM
To: Approvals (PHMSA) <Approvals@dot.gov>
Subject: 49CFR180.605 (e) Periodic inspection and test -- IA-0002

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To Whom It May Concern;

I have an inquiry from a potential customer who has UN Portable Tanks (T75) used for the transportation of refrigerated liquefied gas (Carbon Dioxide).

49CFR180.605 (e) Periodic inspection and test -- "...Portable tanks used for the transportation of refrigerated, liquefied gases are excepted from the requirement for internal inspection and the hydraulic pressure test during the 5-year periodic inspection and test, if the portable tanks were pressure tested to a minimum test pressure of 1.3 times the design pressure using an inert gas as prescribed...before putting the portable tank into service..."

Are these tanks exempt from the 5 year, in this case, pneumatic test?

Looking forward to hearing from you as soon as possible.

Thank you.

Aloha,

Ann Fukunaga

IA-0002

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OSM, LLC
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Honolulu, Hawaii 96816

Telephone: (808) 525-5000
E-mail: osm@oceansurveys.net