



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

1200 New Jersey Avenue, SE
Washington, DC 20590

September 8, 2022

Mr. W. Mark Nelson
Administrator
Alabama Liquefied Petroleum Gas Board
777 S. Lawrence St., Suite 100
P.O. Box 1742
Montgomery, AL 36102-1742

Reference No. 22-0043

Dear Mr. Nelson:

This letter is in response to your May 3, 2022, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to requalification records for the visual inspection of Department of Transportation (DOT) specification cylinders. In your letter, you state that you have a requalifying facility that is currently considering the utilization of equipment that takes a panoramic photo of data on cylinders, which have been visually inspected and batched according to the inspector's findings as follows:

- The cylinders will be batched for photos according to one of the three disposition codes: "OK-Return to Service," "SC-Scrap," or "RM-Return to manufacturer for repair."
- Cylinders whose data is not legible due to excessive paint will first be routed to the sandblast facility to provide for quality photos.
- Photo files will be indexed according to the inspection date, inspector, and disposition codes.
- All cylinders will be 20 lb. steel propane cylinders so "size information" will be the same for all, but magnetic decals can be applied for photos indicating size.
- Additional information can be provided using small magnetic labels applied prior to photographing to detail such information as the "Protective Coating" (Type and Condition). For example – "Paint-Excellent."
- All information currently maintained in handwritten physical logbooks will be available in the photograph files of each cylinder that has been inspected.

Lastly, you state that you believe that photographic records would be more precise because handwritten records often afford the opportunity for human error such as transposing numbers within a serial number or other data. You ask whether the cylinder test records—currently maintained in handwritten logbooks—may be maintained in the form of digitally indexed photographic files as described above.

Provided all the information specified in § 180.215(b) for the requalification records of DOT specification cylinders is contained in the photographic files and a means of organizing and indexing them is included, a photographic system of recordkeeping as described in your letter would be acceptable under § 180.215(b) of the HMR.

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

Sincerely,

A handwritten signature in blue ink, reading "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

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



ALABAMA LIQUEFIED PETROLEUM GAS BOARD

777 S. Lawrence Street, Suite 100

TELEPHONE (334) 241-8887

FAX (334) 240-3255

P.O. BOX 1742

MONTGOMERY, ALABAMA 36102-1742

Pollack
22-0043

W. MARK NELSON
ADMINISTRATOR

May 3, 2022

Mr. Shane Kelley
Director, Standards and Rulemaking Division
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue, SE East Building, 2nd Floor
Washington, DC 20590

Please consider this as a request for clarification and a formal written interpretation on CFR 49 180.215(b). This section of code mandates the information that must be recorded and retained related to visual requalification of cylinders, but it only refers to "test sheets" in addressing the medium. Considering the many advancements in technology, actual recording of data on paper creates tremendous inefficiency in a production environment already greatly hampered by pandemic related cylinder supply issues. We have a requalifying facility considering equipment that takes a panoramic photo of data on cylinders that have been visually inspected by an inspector and batched according to his findings as follows:

- The cylinders will be batched for photos according to one of the three disposition codes "OK-Return to Service", "SC-Scrap", or "RM - Return to manufacturer for repair".
- Cylinders whose data is not legible due to excessive paint will first be routed to the sandblast facility to provide for quality photos.
- Photo files will be indexed according to inspection date, inspector, and disposition codes.
- All cylinders will be 20 lb. steel propane cylinders so "size information" will be the same for all, but magnetic decals can be applied for photos indicating size.
- Additional information can be provided using small magnetic labels applied prior to photographing to detail such information as the "Protective Coating" (Type and Condition). For example - "Paint - Excellent"
- All information currently maintained in handwritten physical log books will be available in the photograph files of each cylinder that has been inspected.
- Photographic records would actually be more precise because handwritten records often afford the opportunity of human error such as transposing numbers within a serial number or other data.

Question: If all information currently maintained in handwritten physical log books will be available in the described photograph files and associated indexing, would this medium be acceptable to PHMSA?

Sincerely,

Mark Nelson, Administrator

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Request for Written Interpretation
Date: Thursday, May 12, 2022 4:55:38 PM
Attachments: [scanner@lpgb.alabama.gov_20220503_104323.pdf](#)

Hi Alice,

Please see the attached interpretation request.

Let me know if you have any questions.

Regards,

-Breanna

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

From: Nelson, Mark <Mark.Nelson@lpgb.alabama.gov>
Sent: Tuesday, May 3, 2022 11:45 AM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Cc: Nuffer, Thomas <Thomas.Nuffer@lpgb.alabama.gov>
Subject: Request for Written Interpretation

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.

Please see attached.

Mark Nelson
Administrator
Alabama Liquefied Petroleum Gas Board
(334) 353-0342
mark.nelson@lpgb.alabama.gov