



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

April 19, 2023

Amy Morgan Bruecks  
Independent Cylinder Training  
406 S.W. 4th Street  
Oklahoma City, OK 73109

Reference No. 22-0092

Dear Ms. Bruecks:

This letter is in response to your September 10, 2022, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to requalification marking of United Nations (UN) pressure receptacles requalified by the hydraulic proof pressure test method. In your email, you state that it is your belief that relevant International Organization for Standardization (ISO) standards and relevant PHMSA special permits are silent on the marking requirements for cylinders permitted to be requalified by the hydraulic proof pressure test method. Specifically, you ask whether UN pressure receptacles requalified by the hydraulic proof pressure test method are required to be marked in accordance with § 180.213(f)(4).

The answer is yes. As a general requirement, no person may mark a packaging or container as meeting the requirements of Part 180 unless marked—as appropriate—in accordance with Part 180. Section 180.207(d) authorizes the hydraulic proof pressure test for UN pressure receptacle requalification. Furthermore, § 180.207(b) states that each pressure receptacle that is successfully requalified in accordance with the requirements specified in this section must be marked in accordance with § 180.213. Therefore, UN pressure receptacles requalified by the hydraulic proof pressure test to meet the testing requirements of the HMR as authorized by § 180.207(d) must be marked in accordance with § 180.213(f)(4).

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen".

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

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)  
**Subject:** FW: Urgent request for interpretation  
**Date:** Tuesday, September 13, 2022 11:46:18 AM  
**Attachments:** [PastedGraphic-1.tiff](#)  
[LOI marking HPP.pdf](#)

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Hello Alice and team,  
Please see the forwarded LOI request.  
Thanks,  
Rachel (HMIC)

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**From:** Amy Bruecks <[amy@amybruecks.com](mailto:amy@amybruecks.com)>  
**Sent:** Saturday, September 10, 2022 6:50 PM  
**To:** INFOCNTR (PHMSA) <[INFOCNTR.INFOCNTR@dot.gov](mailto:INFOCNTR.INFOCNTR@dot.gov)>  
**Subject:** Urgent request for 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.

To whom it may concern,

This email and attached letter requests interpretation to the marking requirements for cylinders requalified by hydraulic proof pressure test. Your prompt response is requested in this matter.

I look forward to your response.

Respectfully,

**Amy Morgan Bruecks**  
Independent Cylinder Training  
406 S.W. 4th Street  
Oklahoma City, OK. 73109  
Direct Phone (405) 516-8248  
Fax (405) 236-5429  
[www.amybruecks.com](http://www.amybruecks.com)

406 S.W. 4<sup>th</sup> Street  
Oklahoma City, OK 73109  
[www.amybruecks.com](http://www.amybruecks.com)



Phone: (405) 516-8248  
[amy@amybruecks.com](mailto:amy@amybruecks.com)

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September 10, 2022

U.S. DOT  
PHMSA Office of Hazardous Materials Standards  
Attn: PHH-10  
East Building  
1200 New Jersey Avenue, SE.  
Washington, DC 20590-0001

RE: Retest marking of cylinders retested by hydraulic proof pressure test method

To Whom It May Concern:

I am requesting interpretation of the marking requirements for cylinders requalified by the hydraulic proof pressure test method.

Specifically, 49 CFR 180.213 (f)(4) states:

For designation of the proof pressure test, the marking is as illustrated in [paragraph \(d\)](#) of this section, except that the "X" is replaced with the letter "S".

Hydraulic proof pressure test is a permitted test method for the requalification of UN pressure receptacles and certain special permit cylinders. 49CFR180.213 (f)(4), relevant ISO standards and relevant special permits lack marking requirements for cylinders permitted to be requalified by hydraulic proof pressure test method.

Are cylinders requalified by the hydraulic proof pressure test method required to be marked in accordance with 49CFR 180.213(f)(4)?

Thank you for your assistance in this matter.

Respectfully submitted,

A handwritten signature in cursive script that reads "Amy Morgan Bruecks".

Amy Morgan Bruecks

Independent Cylinder Training