**Pipeline and Hazardous
Materials Safety
Administration**

MAY 0 8 2014

1200 New Jersey Avenue, SE
Washington, D.C. 20590

Mr. Ruifeng Yin
Authorized Inspector
HSB Technical Consulting & Service (Shanghai) Co., Ltd.
Room 909, Tower A, Fareast Int'l Plaza
319 Xianxia Road, Shanghai, 200051, China

Ref. No.: 14-0074

Dear Mr. Ruifeng Yin:

This is in response to your email dated April 6, 2014, requesting clarification of the
Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) relating to the § 178.45(i)(2)
requirements for tension and Charpy impact testing of production cylinders. You request
confirmation of your understanding that there are two options for cylinders heat treated in a
continuous furnace: 1) tests must be conducted on two tension specimens and three Charpy
impact specimens from one cylinder taken from a test lot based on a production period not
exceeding 200 cylinders; or 2) tests must be conducted on two tension specimens and three
Charpy specimens from a test ring for each four hours or less of production, provided the test
lot based on the production period does not exceed 200 cylinders.

You are correct.

If the required specimens are obtained from a cylinder, the cylinder must be from a test lot
based on a production period of not more than 200 cylinders.

If the required specimens are obtained from a test ring, each test ring must represent a
production time of four hours or less and the test lot based on the production period must not
exceed 200 cylinders.

I trust this information is helpful. If you have further questions, please do not hesitate to
contact this office.

Sincerely,

Shane C. Kelley
Acting International Standards Coordinator
Standards and Rulemaking Division

Babich
§178.45(i)(2)
Cylinders
14-0074

From:	Yin Ruifeng - APAC-Remote-HSBCT <ruifeng_yin@hsbct.com>
Sent:	Sunday, April 06, 2014 11:49 PM
To:	INFOCNTR (PHMSA); Drakeford, Carolyn (PHMSA); Lynch, Tom (PHMSA); Wayne.Chaney@dot.gov
Cc:	李军旺
Subject:	Question about 178.45 (i)(2) interpretation

Dear all

This is DOT inspector (Mr. Ruifeng Yin) come from HSBCT. My costumer is Shijiazhuang Enric gas equipment co; ltd.

The question is 178.45(i)(2) said When the cylinders are heat treated in a continuous furnace, two tension specimens and three Charpy impact specimens must be tested from one of the cylinders or a test ring from each four hours or less of production. However, in no case may a test lot based on this production period exceed 200 cylinders.

My understanding: there has two options (1) The test is required on 2 specimens and three Charpy impact specimens cut from 1 cylinder taken at random out of each lot of 200 or less.
(2) two tension specimens and three Charpy impact specimens must be tested from a test ring from each four hours or less of production, in no case may a test lot based on this production period exceed 200 cylinders.

Could you tell me my understanding is right or wrong?

Ruifeng Yin
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