U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

MAY 10 2000

Mr. Richard C. Willard
President
Keehn Service Corporation
99 North 11th Avenue
Coatesville, Pennsylvania 19320

Ref. No. 00-0123

Dear Mr. Willard:

This responds to your letter, dated April 18, 2000, concerning certain record keeping requirements applicable to cargo tanks used to transport liquefied compressed gases under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask about the information that will be required to document hose testing conducted by a Registered Inspector in accordance with § 180.407(h)(4) of the HMR.

As currently written, the language related to record keeping in § 180.407(h)(4) is unclear, particularly the reference to the date of the "original hose assembly test." The inclusion of the term "original" in this paragraph was inadvertent. To comply with the record keeping requirements in this paragraph, a Registered Inspector must note the hose identification number of the hose being tested, the date of the test, and the condition of the hose assembly and piping system tested. We will delete the inadvertent reference to an "original" hose assembly test in a future rulemaking.

Section 180.416(b) of the HMR requires operators to assure that each cargo tank delivery hose assembly is permanently marked with a unique identification number and maximum working pressure. This marking must be applied by July 1, 2000. In addition, after July 1, 1999, new and repaired hose assemblies must be marked with the month and year that they were pressure tested in accordance with §§ 178.337-9(b)(7) and 180.416(f). Hose assemblies manufactured or repaired prior to July 1, 1999, will not have this test marking.

You are correct that, after July 1, 2000, operators must maintain written records documenting pressure tests for new and repaired hose assemblies. The record must include the date of the test, the signature of the inspector, the name of the hose owner, the hose identification number, the date of the original

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delivery hose assembly and test, notes of any defects observed and repairs made, and an indication that the delivery hose assembly passed or failed the tests or inspections. For hose assemblies manufactured or repaired prior to July 1, 1999, there will be no date for an original hose assembly test because none was required before this date. For hose assemblies manufactured after July 1, 1999, the date the hose assembly was manufactured and pressure tested will be marked on the hose and must be entered on the written record documenting any subsequent pressure test.

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

Sincerely,

Thomas G. Allan

Thomas G. Allan
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards

KEEHN SERVICE CORPORATION

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§ 180.407
00-0123

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April 18, 2000

Mr. Edward T. Mazzullo, Director
Office of Hazardous Materials Standards
United States Department of Transportation
Research and Special Programs Administration
400 Seventh Street, Southwest
Washington, DC 20590

RE: Request for Clarification-Hose Testing and Inspection

Dear Mr. Mazzullo,

Keehn Service Corporation is currently involved with the fabrication, testing, and repair of MC-330 and 331 compressed gas equipment. We hold valid "U" and "R" certification stamps and are registered with the Department under CT number 0140.

In preparation for the new hose inspection deadline of July 1, 2000, we are making modifications to our external visual ("V") and leakage test ("K") forms. Under the leakage test requirements as shown in 180.407 (h) (4), we foresee the potential problem of receiving customers equipment brought into our shop for this inspection without the original test date and serial number marked on the delivery hose or hoses. This will be especially true for the propane bobtail trucks with hoses mounted on hose reels on the back deck of the truck. Under the current regulations as shown in 180.407 (h)(4), if these markings are missing, the hose does not comply with the current regulations.

> ***§180.407(h)(4)*** *After July 1, 2000, Registered Inspectors of specification MC-330 and MC331 cargo tanks, and nonspecification cargo tanks authorized under §173.315 (k) of this subchapter must visually inspect the delivery hose assembly and piping system while the assembly is under leakage test pressure utilizing the rejection criteria listed in §180.416 (g). Delivery hose assemblies not permanently attached to the cargo tank motor vehicle may be inspected separately from the cargo tank motor vehicle. In addition to a written record of the inspection prepared in accordance with §180.417 (b),* ***the Registered Inspector conducting the hose test must note the hose identification number, the date of the original hose assembly test****, and the condition of the hose assembly and piping system tested.*

There does not appear to be any relief from the regulation requiring certain original hose manufacturer markings. Even under the new and repaired section for delivery hose assemblies as shown in 180.416 (f), which allows for the retesting of a repaired hose, the date of the original hose assembly and test is required.

§180.416(f)(3) After July 1, 2000, the operator must complete a record documenting the test and inspection, including the date, the signature of the inspector, the hose owner, ***the hose identification number, the date of original delivery hose assembly and test,*** *notes of any defects observed and repairs made, and an indication that the delivery hose assembly passed or failed the tests and inspections.*

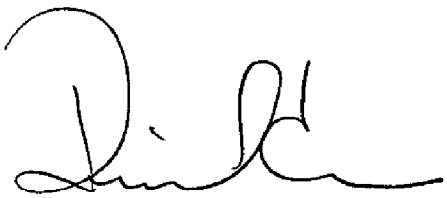
What we are proposing is that in the event we find a hose that does not have the required markings, and the operator or owner cannot provide this information to us from his or her files, that we be capable of recertifying the existing hose assembly (if we so choose) by performing the following operations:

1. Perform a visual inspection of the full length of the outside of the hose assembly and reject any assemblies per the rejection criteria as contained in §180.416(g).
2. With visual inspection approval, pressure test the hose to 120 percent of hose maximum working pressure (generally extruded into the covering of the hose itself).
3. Permanently mark the tested assembly with the date of this test, the test pressure, and a ***new unique identification number*** for this assembly. A report of this retesting (sample attached) would be provided to the owner or lessor of the vehicle on which it is installed with a copy to be retained on file by us as the hose testing company.

This proceedure would allow for the continued use of otherwise good and safe hose assemblies. These assemblies are expensive (a new 1" diameter by 150 foot long propane delivery hose sells for $455.00) and if inspected and tested properly could provide additional years of safe delivery for our customers.

Please advise at your earliest convenience if you find our suggestion plausible. I can be reached by telephone at the number shown above or by email at rcwillard@aol.com for comments or questions. Thank you for your help in this matter.

Sincerely,



Richard C. Willard
President

Attachment

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Keehn Service Corporation
Hose Test Report

Customer : _____

Customer Location (District) : _____

Truck unit number : _____

Original Hose Information

Make of hose : _____

Diameter of hose : _____

Length of hose : _____

Previous test I.D. or Keehn S.O. number : _____

Original hose test date : _____

Original hose test pressure : _____

New Test Information

New Keehn Identification Number : _____

New Test Date : Month : _____ Day : _____ Year : _____

Test Pressure : _____ (120% of maximum work pressure- 350 Rated hose=420 Lbs.test)

Inspection Criteria

	PASS	FAIL
1- Condition Of Hose Assembly:		
2- Damage to hose cover that exposes the reinforcement.		
3- Wire braid reinforcement has been kinked or flattened so as to permanently deform the wire braid.		
4- Soft spots when not under pressure, bulging under pressure or loose outer covering.		
5- Loose or missing bolts or fasteners on bolted hose coupling assemblies.		

Inspector Print : _____ Inspector Signature : _____