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

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

JUN 25 2001

Mr. Bobby Downer
Plant Manager
Matheson Tri-Gas
P.O. Box 136
Morrow, Georgia 30260

Reference No.: 01-0073

Dear Mr. Downer:

This is in response to your February 28, 2001 letter, requesting clarification on the qualification, maintenance, and use of cylinders under § 173.34 (e)(13) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether a cylinder used in exclusive service for Liquefied hydrocarbon gas and Liquefied petroleum gas would include the "vapor phase" of the various gases shown in the table entries for these two groups.

The answer is yes. A cylinder used exclusively for the listed gases or mixtures, including their vapor phase, and provided they are commercially free from corroding components, can be given a complete visual inspection instead of a periodic hydrostatic retest at the time periodic retest comes due.

I hope this information is helpful. Should you have further questions, please contact us.

Sincerely,

Hattie L. Mitchell

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards

010073

173.34(e)(13)

Bells
§ 173.34(e)(13)
Cylinder
01-0073

MATHESON
TRI·GAS

P.O. Box 136
Morrow, GA 30260

Tel: (770) 961-7891
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DOT/RSPA/OHMS
UNIT
01 MAR -7 PM 4:41

February 28, 2001

Mr. Ryan Posten
U.S. Dept. of Transportation
Research and Special Programs Administration
Room 8100
400 7th Street S.W.
Washington, D.C. 20590

Dear Mr. Posten:

I am contacting you to request a clarification of a provision in 49 CFR 173.34(e)(13). The regulation makes allowance for certain listed specification cylinders to be requalified by external visual examination in lieu of hydrotest provided they are used in the exclusive services as listed. My request involves two of the exclusive services , Liquefied hydrocarbon gas, and Liquefied petroleum gas. The description clearly says 'liquefied', i.e. liquid phase. My question is whether these services might also be interpreted to include 'vapor phase' mixtures of the various gases in these two groups. My feeling is that they should, given the fact that these gases always exhibit a vapor phase even when the liquid portion has been removed from the cylinder during use. I know that this section has received much attention in the past, but I could not find any reference to this particular concern.

Thank you in advance for your response.

Sincerely,

Bobby Downer

Bobby Downer
Plant Manager