



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

MAY 10 2005

Mr. Glen L. Kinney
G & C Kinney, Inc.
306 Cutter Cove
Stafford, VA 22554

Ref. No. 05-0087

Dear Mr. Kinney:

This responds to your telephone conversation with Mr. Ryan Posten, Exemptions Program Officer, Office of Hazardous Materials Exemptions and Approvals, requesting clarification of the requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) concerning calibration verification of equipment used for volumetric expansion tests for DOT specification cylinders. Specifically, you ask whether the maximum pressure at which the verification test is being conducted (for example, 3,000 pounds) must be maintained at the final pressure for 30 seconds or whether the pressure may be allowed to drop between 2 psi and 10 psi.

Overall, for any pressure test (calibration or production retest), the 30-second hold time begins only when the cylinder has completed its expansion. If the cylinder pressure drops by any measurable amount (such as 2 psi) during the recorded 30-second hold time, the hold time must be restarted or the test would be considered invalid.

I hope this information is helpful. If you need additional information, please do not hesitate to contact this office.

Sincerely,

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



050087

180.205

G & C KINNEY, INC.
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April 4, 2005

US Department of Transportation
Research and Special Programs Administration
Regulatory Review and Reinvention
Office of Hazardous Materials Standards
400 Seventh Street
Washington DC 20590

McIntyre
§180.205
Cylinders
05-0087

Attn: Hattie L. Mitchell

Dear Ms. Mitchell:

This is a request for interpretation of CFR 49 part 180.205 (g), (3), (4) and (5) with reference calibration verification of the test equipment used for volumetric expansion tests of DOT pressure cylinders.

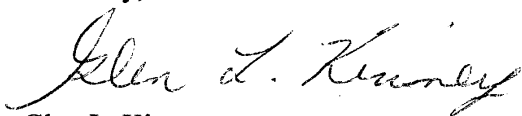
Operators of DOT facilities that use computerized hydrostatic testing equipment have stated the following: During system calibration verification (required by CFR 49 Part 180 (g) (3), (4), and (5)) while pressurizing the calibrated cylinder to the maximum pressure to be tested the maximum pressure should be exceeded by 10 PSI to allow for some leakage that may take place at that pressure. In other words, if the desired verification pressure is 3000 pounds the calibrated cylinder should be pressurized to 3010 pounds and if the pressure does not fall below 3000 pounds, during the 30 seconds hold time required by CFR 180.205 (g) (5), the test is considered acceptable.

In reviewing the written instructions furnished with the equipment I have not been able to find any reference to such a procedure. In telephone conversations with the manufacturers, I have been informed that these systems can not be manufactured to be totally leak proof at the higher pressures and that these minute leaks will not show up in the older systems (burettes and weight bowl systems).

Part 180.205 (g) (5) States; Minimum test pressure must be maintained for at least 30 seconds and as long as necessary for complete expansion of the cylinder.

Question: Does this section of part 180.205 (g) (5) apply to the calibration verification portion (180.205 (g) (3) and (4)) of the rule? By that I mean, must the maximum pressure the verification is being conducted at (i.e. 3000lbs) be maintained at that final pressure (i.e. 3000 lbs.) for 30 seconds or can it be allowed to drop between 2 and 10 PSI and still be considered acceptable for verification?

Sincerely,



Glen L. Kinney
President