



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590

NOV 19 2007

Mr. Kerry Hricsina
American Cap Company
15 Church Street
Wheatland, PA 16161

Ref. No. 07-0154

Dear Mr. Hricsina:

This is in response to your e-mail asking whether the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) require the testing of cylinder valve caps. Specifically, you ask whether the HMR require testing in accordance with the Compressed Gas Association publication, CGA V-9, "Standard for Compressed Gas Cylinder Valves."

Currently, the HMR do not incorporate by reference CGA V-9 or otherwise require the testing of cylinder valve caps. However, § 173.40(c) requires that each plug or valve must be capable of passing the test pressure of the cylinder without damage or leaking.

In a notice of proposed rulemaking (HM-218E, 72 FR 18446; April 12, 2007), we proposed to incorporate by reference CGA V-9 into §§ 173.40 and 173.301. We are reviewing the comments received in response to the notice, which also are available for public review at our website at <http://hazmat.dot.gov> under the Rules and Regulations icon. We expect to publish a final rule during the first quarter of 2008.

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

Sincerely,

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

8/14/07

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Thursday, August 09, 2007 3:19 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Request for cylinder cap testing requirements

McIyre
 §173.301(c)
 §173.40(d)
 Cylinders
 07-0154

Wants a written letter of Interp. on this subject 8/9

From: Kerry Hricsina [mailto:khricsina@americap-mfg.com]
Sent: Thursday, August 09, 2007 12:57 PM
To: INFOCNTR <PHMSA>
Subject: Request for cylinder cap testing requirements

Wants a written letter of Interp. on this subject

Sir/Ms,

I have searched though out the new regulations to the best of my ability and the only reference where I have found any mention of the CGA V-9 is in regard to the valves only. The cap testing information that I have found is located in the section 173.301b(c), 173.40(d) and does not mention the CGA V-9 cap testing requirements. My question is this: **Is there any section in the CFR that requires my company to test cylinder caps to the CGA V-9 standard?** If so, please let me know what section this information is located.

Thank you,
 Kerry Hricsina
 American Cap Co. Inc.
 Wheatland, Pa. 16161
 1-724-981-4461 x 117
 email: khricsina@americap-mfg.com

American Cap Company's Quality Policy:

- *To continually develop our specialty products & services.*
- *Meet or exceed our customer requirements.*
- *Become a world class leader in our market.*

8/9/2007