



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

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

AUG 09 2010

Mr. Tom Sauta
Hydro-Test Products Inc.
85 Hudson Road
Stow, MA 01775

Ref. No. 10-0006

Dear Mr. Sauta:

This is in reference to your request for a clarification of a requirement appearing in 49 CFR 180.205(g)(6) that states training materials (e.g., CGA publication C-1.1) may be used for training persons who requalify cylinders using the volumetric expansion test methods. Specifically, you ask whether the sole use of the referenced publication would satisfy the training requirements in § 172.702. We apologize for the delay in responding and any inconvenience it may have caused.

The answer to your question is no. As you are aware, we specifically stated in the preamble of the HM-244A final rule that CGA C 1.1 could be used as guidance material to assist cylinder requalifiers in setting up their training procedures and was not to be considered as a stand-alone tool for training persons on how to perform requalification of cylinders using the volumetric expansion test method. In the final rule, we also stated we were removing the entries in §§ 171.7(b) and 180.205(g)(6) that refer to the publication. However, due to an oversight, the amendatory language was inadvertently omitted. These regulatory entries are scheduled for removal in an upcoming (HM-244C) final rule.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

T. Glenn Foster
Acting Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards

March 29, 2010

Mitchell
§ 180.205(g)(6)
§ 172.702
Cylinders | Training
10-0006

Attn: Ms. Hattie Mitchell
U.S. Department of Transportation
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, S.E.
Washington, DC 20590-0001

Re: Request for written interpretation

I am writing to request a written interpretation on §180.205(g)(6) of CFR Title49 which states;

“Training materials (e.g. , CGA publication C-1.1) may be used for training persons who requalify cylinders using the volumetric expansion test method.”

Hydro-Test Products is involved with the re-training requirement of §172.702 for cylinder requalifiers. We feel that §180.205(g)(6) is misleading in that many cylinder requalifiers, independent inspectors and enforcement inspectors are of the opinion that by using this pamphlet, the training requirements are met.

Please advice your department’s position, as to whether §180.205(g)(6) meets the requirements of §172.702.

Thank you for your time and I look forward to your reply.

Best Regards,

Tom Sauta

Tom Sauta
Hydro-Test Products Inc.



Hydro-Test Products Inc.
85 Hudson Road Stow, Massachusetts 01775 USA
Tel: 800-225-9488 / 978-897-4647 Fax: 978-897-1942
www.hydro-test.com
email: tom@hydro-test.com