



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

1200 New Jersey Avenue, SE
Washington, DC 20590

SEP 01 2011

Mr. Douglas Svoboda
Flightpath Services, Inc.
500 Hollister Road
Teterboro, NJ 07801

Ref. No. 11-0131

Dear Mr. Svoboda:

This responds to your letter requesting clarification of the cylinder requalification provisions under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether all cylinders must be requalified before refilling or just those cylinders where requalification is due or past due. Additionally, you ask if requalification is required if a cylinder installed in an aircraft rapidly discharges (e.g., emergency inflation cylinder on a life raft) before it can be returned to service.

In accordance with § 180.205(c) of the HMR, a cylinder may be requalified at any time before or during the month and year the requalification is due. A cylinder filled before the requalification becomes due may remain in service until it is emptied. A cylinder with a specified service life or past its requalification date may not be refilled and offered for transportation after its authorized service life has expired or, it is requalified, respectively.

For a cylinder installed in an aircraft that rapidly discharges, requalification is required if the conditions specified in § 180.205(d) are met. Specifically, a cylinder must be tested and inspected, without regard to any other periodic requalification requirements, prior to further use if: (1) The cylinder shows evidence of dents, corrosion, cracked or abraded areas, leakage, thermal damage, or any other condition that might render it unsafe for use in transportation; (2) The cylinder has been in an accident and has been damaged to an extent that may adversely affect its lading retention capability; (3) The cylinder shows evidence of or is known to have been over-heated; or (4) The Associate Administrator determines that the cylinder may be in an unsafe condition.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Drakeford, Carolyn (PHMSA)

Stevens
§180.205(c)
Cylinders
11-0131

From: INFOCNTR (PHMSA)
Sent: Thursday, June 02, 2011 11:12 AM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Hazmat Information Center Feedback: Highway (Sections 177.800 & 177.870)

Hi Carolyn,

The caller below requested his e-mail be forwarded for a formal letter of interpretation.

Thanks,
Victoria

Victoria Lehman
Hazmat Information Center (HMIC)
<http://phmsa.dot.gov/hazmat/info-center>
(202) 366-1035

-----Original Message-----

From: PHMSA-Feedback [mailto:PHMSA-Feedback]
Sent: Wednesday, June 01, 2011 8:29 PM
To: PHMSA HM InfoCenter; PHMSA Webmaster
Subject: Hazmat Information Center Feedback: Highway (Sections 177.800 & 177.870)

Some of my constituents are interpreting the sentence in 180.205 paragraph c, ("However, a cylinder filled before the requalification becomes due may remain in service until it is emptied.") means any cylinder, not just one past it's requalification date, but regardless of requalification date needs to be requalified before recharging. I need a interpretation in writing to clear up this matter.

Also is there any regulation requiring requalification after a rapid discharge, such as a emergency inflation cylinder on a life raft.

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