



U.S. Department  
of Transportation

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

**Pipeline and Hazardous  
Materials Safety  
Administration**

JAN 22 2015

Mr. Hyun-Joon Ji  
Assistant Manager  
Quality Inspection Team  
NK CO., LTD  
497, Sinpyeong-dong, Saha-gu,  
Busan 604-030, Korea

Ref. No.: 12-0242

Dear Mr. Ji:

This is in response to your October 24, 2012 email concerning the requirements for cylinders in accordance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you request confirmation of your understanding of the appropriate lot size for conducting the physical tests on DOT 3AA and DOT 3AAX cylinders. In your letter you describe a scenario in which cylinders are subjected to heat treatment two at a time in a continuous furnace using a conveyor. Specifically you ask if cylinders continuously fed into the heat treatment furnace may be considered the same lot for the purposes of conducting the physical tests in accordance with § 178.37.

Provided each of the cylinders were processed through the same equipment under the same conditions of time and temperature those cylinders may be considered the same lot for the purposes of testing in accordance with § 178.37.

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

Sincerely,

Delmer Billings  
Senior Regulatory Advisor  
Standards and Rulemaking Division

**Drakeford, Carolyn (PHMSA)**

Leary  
3 178.37(g)  
Cylinders  
12-0242

**From:** hjji@nkcf.com  
**Sent:** Thursday, October 25, 2012 6:33 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Cc:** Drakeford, Carolyn (PHMSA)  
**Subject:** [RE]:RE: [RE]:Re: [RE]:Re: [RE]:RE: [FW]:RE: A inquire related to DOT Audit at NK-Korea

Dear Mr. Charles Betts,

Thank you very much for your letter.

By the way, I have an additional question as follow :

First of all, I would like to explain concretely our heat treatment process for the clearness of a lot size. Our heat treating furnace can heat-treat only two cylinders at a time due to the limit of furnace size. In order to heat-treat more than two cylinders the first 2 cylinders are heat-treated in the furnace and then following 2 cylinders on standby out of the furnace are continuously be entered into the furnace to be heat-treated (continuous furnace type using conveyor).

As a result, the heat treatment condition of the first 2 cylinders and the following 2 cylinders is "very similar" not the "100% same" each other.(I believe that the "same heat treatment condition" is possible in the batch furnace type)

Therefore, could you please let us get your opinion about whether they could be considered or not as a lot (maximum 30) in that case? This is our key point of the question.

Best regards,

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Hyun-Joon Ji, Assistant Manager (지현준 대리)  
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\*\*\*\*\*

▶ Original Message-----

From : <[carolyn.drakeford@dot.gov](mailto:carolyn.drakeford@dot.gov)>  
To : <[hjji@nkcf.com](mailto:hjji@nkcf.com)>  
CC :  
Sent : 2012-10-24 11:53:22 PM  
Subject : RE: [RE]:Re: [RE]:Re: [RE]:RE: [FW]:RE: A inquire related to DOT Audit at NK-Korea

Mr. Hyun-Joon Ji,

On behalf of Mr. Charles Betts, Director Office of Pipeline Hazardous Materials Safety, Standards and Rulemaking Division attached is your response to your inquiry below. If you have any additional questions, please do hesitate to contact the Standards and Rulemaking Division at (202) 366-8553.

Thank you,