



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JUN 25 2015

Ms. Nida Chaudhary
Transport Canada, TDG
Place de Ville, Tower C, 9th Floor
330 Sparks Street
Ottawa, Ontario K1A 0N5

Ref. No.: 15-0042

Dear Ms. Chaudhary:

This is a response to your February 27, 2015 email requesting further clarification of the requalification of Department of Transportation (DOT) specification cylinders under § 180.209 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) with respect to guidance provided in letter of interpretation (LOI) Ref. No. 14-0067 issued June 5, 2014.

In the 14-0067 LOI, you sought clarification on the requalification requirements applicable to DOT specification cylinders that have an outside diameter of 2 inches or less and are less than 2 feet in length. You cited Note 1 to Table 1 (Requalification of Cylinders) in § 180.209 which states that “any cylinder not exceeding 2 inches outside diameter and less than 2 feet in length is excepted from volumetric expansion test.” You specifically asked whether DOT specification cylinders below that size are subject to requalification by proof pressure test or an internal visual inspection.

In our response to that question, we answered that “cylinders not exceeding 2 inches in outside diameter and less than 2 feet in length are not subject to any other pressure testing requirements or an internal visual inspection. However, small cylinders of this type must be tested and inspected prior to further use if they meet any of the criteria in § 180.205(d).”

In your February 27, 2015 email, you ask for additional clarification and regulatory insight. Your questions are answered as follows:

- Q1. Is a cylinder less than 2” OD and 2’ length exempt from all periodic requalification requirements?
- A1. The answer is yes. Small specification cylinders not exceeding 2 inches in outside diameter and less than 2 feet in length are not subject to the periodic requalification in § 180.209(a). However, small cylinders of this type must be tested and inspected prior to further use if they meet any of the criteria in § 180.205(d).

- Q2. Specifically, for a cylinder such as a DOT-3AL that is less than 2" OD and 2' length, is there a requirement for the cylinder to undergo an EXTERNAL visual examination, be marked by a facility with a RIN, and have a record kept of this requalification?
- A2. The answer to this group of questions is no. Please see A1.
- Q3. Is the exemption for these smaller cylinders with regards to periodic requalification an exemption like that for the DOT-3E and DOT-4L specifications?
- A3. The exemptions for periodic requalifications of the cylinders you listed are similar. Please see A1.

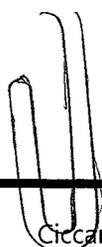
I hope this information is helpful. If you have any more questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Glenn Foster". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

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

Dodd, Alice (PHMSA)



Nickels
§ 180.209
Reclassification
Cylinders
15-0042

From: Ciccarone, Michael CTR (PHMSA)
Sent: Monday, March 09, 2015 1:00 PM
To: Hazmat Interps
Subject: FW: Request for Letter of Interpretation - 49 CFR 180.209

Shante/Alice,

Please submit this for a formal letter of interpretation. Ms. Chaudhary spoke with Neal and Jordan.

Thanks,

Mike

From: Chaudhary, Nida [mailto:Nida.Chaudhary@tc.gc.ca]
Sent: Friday, February 27, 2015 5:22 PM
To: INFOCNTR (PHMSA)
Subject: Request for Letter of Interpretation - 49 CFR 180.209

Good day,

I formerly submitted a request for interpretation regarding 49 CFR 180.209. My original request appears below. As a response I was issued the interpretation with Ref No.:14-0067.

Please take this as a follow up request for interpretation to obtain further clarification. I require a response to the second part of my initial question:

Is a cylinder less than 2" OD and 2' length exempt from all requalification requirements?

For clarification purposes, I add the following follow-up questions: Specifically, for a cylinder such as a DOT-3AL that is less than 2" OD and 2' length, is there a requirement for the cylinder to undergo an EXTERNAL visual examination, be marked by a facility with a RIN and have a record kept of this requalification? Or is the exemption for these smaller cylinders with regards to periodic requalification an exemption like that for the DOT-3E and DOT-4L specifications?

I understand from the original interpretation that periodic requalification with pressure test and internal inspection is not required, however the response was not clear with regards to external visual inspection.

Thank you in advance,

Nida Chaudhary
Engineer / Ingénieure

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330 Sparks Street / 330, rue Sparks, Ottawa, Ontario K1A 0N5

From: Chaudhary, Nida
Sent: Tuesday, April 01, 2014 4:11 PM
To: 'infocntr@dot.gov'
Subject: Request for Letter of Interpretation - 49 CFR 180.209

Good day,

This email is for a **request for letter of interpretation**

My question is regarding **49 CFR 180.209 Table 1 note 1** (see highlighted below)

Question: The wording of this note states that a cylinder below these dimensions is excepted from volumetric expansion test. Does this mean that a cylinder less than 2" OD and 2' length must undergo requalification by either proof pressure or visual examination instead? Or does this mean that this cylinder is exempt from all requalification requirements? For example, for a small DOT-3AL cylinder that is less than 2" OD and 2' length.

TABLE 1—REQUALIFICATION OF CYLINDERS ¹

Specification under which cylinder was made	Minimum test pressure (psig) ²	Requalification period (years)
DOT 3	3000 psig	5
DOT 3A, 3AA	5/3 times service pressure, except noncorrosive service (see § 180.209(g)).	5, 10, or 12 (see § 180.209(b), (f), (h), and (j))
DOT 3AL	5/3 times service pressure	5 or 12 (see § 180.209(j))
DOT 3AX, 3AAX	5/3 times service pressure	5
3B, 3BN	2 times service pressure (see § 180.209(g)).	5 or 10 (see § 180.209(f))
3E	Test not required.	
3HT	5/3 times service pressure	3 (see §§ 180.209(k) and 180.213(c))
3T	5/3 times service pressure	5
4AA480	2 times service pressure (see § 180.209(g)).	5 or 10 (see § 180.209(h))
4B, 4BA, 4BW, 4B-240ET	2 times service pressure, except noncorrosive service (see § 180.209(g)).	5, 10, or 12 (see § 180.209(e), (f), and (j))
4D, 4DA, 4DS	2 times service	5
DOT 4E	2 times service pressure, except noncorrosive (see § 180.209(g)).	5
4L	Test not required.	
8, 8AL		10 or 20 (see § 180.209(i))
Exemption or special permit cylinder	See current exemption or special permit	See current exemption or special permit
Foreign cylinder (see § 173.301(j) of this subchapter for restrictions on use).		
As marked on cylinder, but not less than 5/3 of any service or working pressure marking.		
5 (see §§ 180.209(l) and 180.213(d)(2))		
¹ Any cylinder not exceeding 2 inches outside diameter and less than 2 feet in length is excepted from volumetric expansion test.		
² For cylinders not marked with a service pressure, see § 173.301a(b) of this subchapter.		

Please note that I have spoken to DOT personnel about this issue before, specifically Mark Toughiry, but I would like a written letter of interpretation to present to the CSA B339 committee. We are working on a similar section for the Canadian standard that is adopted in Canadian regulations.

Thank you in advance,

Nida Chaudhary
Engineer / Ingénieure

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