



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

OCT 13 2005

400 Seventh Street, S.W.
Washington, D.C. 20590

Mr. Les Musselman, P.E.
Manager of Product Technology
Taylor-Wharton
P. O. Box 2365
Harrisburg, PA 17105-2385

Reference No.: 05-0179

Dear Mr. Musselman:

This responds to your letter requesting clarification of the requirements for visual inspection of steel cylinders under § 180.205(f) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask what level of paint constitutes “inhibiting visual inspections.”

Section 180.205(f) requires the visual inspection of a steel cylinder to be performed in accordance with CGA Pamphlet C-6. The HMR and CGA Pamphlet C-6 are silent on the level of paint that would inhibit visual inspection of a cylinder. It is our opinion that excessively caked paint or evidence of exfoliation, such as peeling, blistering or scaling paint, warrants the removal of the paint in the affected area to detect abnormalities that indicate a potential or actual weakness that could make the cylinder unsafe for transportation.

I hope this satisfies your inquiry.

Sincerely,

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



050179

180.205(F)



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July 27, 2005

Ms. Susan Gorsky
Acting Director
U.S. Department of Transportation
Pipeline and Hazardous Material Safety Administration
Office of Hazardous Material Standards
PHH-10
400 7th Street SW
Washington DC
20590

Corbin
§ 180.205 (f)
Cylinders
05-0179

Ms. Gorsky,

In 49 CFR 180.205 (f) (1) the statement is made that a visual inspection of steel cylinders must be performed in accordance with CGA Pamphlet C-6.

In C-6 section 5.3.1 the statement is made that all rust, scale, caked paint, caked coatings, etc. shall be completely removed from the exterior surface.

In 49 CFR 180.205 (f) (2) the statement is made that the exterior coating shall be removed if it would inhibit the visual inspection of the cylinder.

Does the Office have a position on what level of paint constitutes "inhibiting visual inspection"? We are unclear on the position of the Office concerning the level of removal of surface paint prior to external visual inspection.

Your assistance with this matter is most appreciated.

Sincerely,

Les Musselman, P.E.
Mgr. of Product Technology
Taylor-Wharton