



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

JUL -3 2006

Mr. Ronnie Hamblin
Volvo Aero Services (Seattle) LLC
18516 8th Avenue South
Kent, Washington 98032

Ref. No.: 06-0105

Dear Mr. Hamblin:

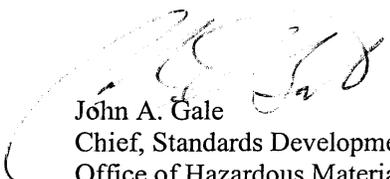
This responds to your letter regarding periodic retest of compressed gas cylinders under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

Specifically, you ask whether a charged compressed gas cylinder (oxygen, etc.) that is beyond its requalification/retest interval, may be transported via any mode from its place of origin to another facility, to a requalification/retest facility, or be stored indefinitely in a warehouse environment without being requalified/retested.

The answer is yes. A cylinder may be requalified at any time during or before the month and year that the requalification is due. A cylinder filled (i.e., charged) before the requalification becomes due may remain in service until it is emptied, and a commercial enterprise may transport those cylinders in commerce by highway, rail, air, or vessel in compliance with the HMR (see §180.205).

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,


John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



060105

180.205

5/16/06

Engrum
§180.205 (c)
Cylinders
06-0105

From: Ron Hamblin
E-mail: ronnie.hamblin@volvo.com

To: USDOT DHM-10
400 7th Street S.W.
Washington, DC
20590

Attention: Director of Hazard Material Standard, Edward Mazzull

Letter of Interpretation

I have read CFR49, 180.205, (c) and have a few questions.
The following questions are regards to the transportation on compressed gas cylinders:

1. Can **charged compressed gas cylinders (oxygen and etc)** that are beyond their requalification / retest interval be transported via any mode from its place of origin to another facility?
2. Can **charged compressed gas cylinders (oxygen and etc)** that are beyond their requalification test interval be transported via any mode from its place of origin to a requalification/retest facility?
3. Can **charged compressed gas cylinders (oxygen and etc)** that are beyond their requalification test interval be stored indefinitely in a warehouse environment without being requalified / retested?

Beyond their requalification test interval may be as much as 10 to 15 years.

Would like either yes or no answer if possible but if the CFR specifically answers the above questions would like the location within CFR the information can be found.

If possible I would like a response via E-mail but if not possible I will supply my address information if needed.

Thank you,
Ron Hamblin