



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

JUN 05 2014

Ref No.: 14-0067

Dear Ms. Chaudhary:

This is a response to your April 1, 2014 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) with regard to the requalification of DOT specification cylinders. Specifically, you seek clarification on the requalification requirements applicable to DOT specification cylinders that are 2 inches or less outside diameter and less than 2 feet in length.

Sections 180.205 and 180.209 provide the requalification requirements applicable to DOT specification cylinders. In § 180.209, Table 1 provides the minimum test pressure and requalification period for DOT specification cylinders. Note 1 to Table 1 states that “any cylinder not exceeding 2 inches outside diameter and less than 2 feet in length is excepted from volumetric expansion test.” You ask whether DOT specification cylinders below the size stated above are subject to requalification by proof pressure test or an internal visual inspection.

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).

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

Sincerely,

Robert Benedict  
Chief, Standards Development  
Standards and Rulemaking Division

Suchak  
3180.209

**Drakeford, Carolyn (PHMSA)**

**From:** INFOCNTR (PHMSA)  
**Sent:** Tuesday, April 01, 2014 4:19 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Request for Letter of Interpretation - 49 CFR 180.209

Cylinders  
14-0067

Hi Carolyn,

This caller requested we submit this e-mail as a formal letter of interpretation.

Thanks,  
Victoria

**From:** Chaudhary, Nida [mailto:Nida.Chaudhary@tc.gc.ca]  
**Sent:** Tuesday, April 01, 2014 4:11 PM  
**To:** INFOCNTR (PHMSA)  
**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))	5
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))	5
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))	5
4B, 4BA, 4BV, 4B-240ET	2 times service pressure, except noncorrosive service (see § 180.209(g)), 5, 10, or 12 (see § 180.209(e), (f), and (j))	5
4D, 4DA, 4DS	2 times service	5
DOT 4E	2 times service pressure, except noncorrosive (see § 180.209(g)), 5	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(i) 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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