



U.S. Department of Transportation  
Pipeline and Hazardous Materials  
Safety Administration

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

JUN 07 2010

Mr. Dave Finlay  
Regional HSSE Manager - Americas  
Wilhelmsen Ships Service  
9400 New Century Drive  
Pasadena, TX 77507

Ref. No.: 10-0100

Dear Mr. Finlay:

This responds to your April 19, 2010 email regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to a particular CGA publication. Specifically, you ask whether the HMR requires testing of cylinder valves to be in accordance with the Compressed Gas Association publication, CGA V-9, "Standard for Compressed Gas Cylinder Valves."

The answer is no. Currently, § 171.7(a)(2) of the HMR do not incorporate by reference the CGA V-9 publication. However, the outside of cylinders are required by § 173.301(a)(2) to be visually inspected prior to each filling. Any cylinder having a defective valve or other detrimental damage may not be filled and offered for transportation.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Hattie L. Mitchell".

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

Nickels  
§180.205(d)(1)

**Drakeford, Carolyn (PHMSA)**

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Cylinders  
10-0100

**From:** Finlay, David [David.Finlay@wilhelmsen.com]  
**Sent:** Tuesday, April 20, 2010 11:38 AM  
**To:** INFOCNTR (PHMSA)  
**Subject:** FW: CO2 valve reconditioning  
**Attachments:** CGA V9 Valves.pdf; WSE-50-03-018\_Technical bulletin.doc

Sir

As discussed.

We have always used CGA P-15 **2.4.3** as our guide which states valve "outlets should be in good condition with clean sharp threads and an undamaged seating surface. If not the valve should be replaced".

Although the damage to the valve outlet is minimal, our fear is that we could have liability if we follow the suggestion below. We are also asked to seek USDOT approval for this which is why your opinion is so important to us.

My thanks for your quick response it is much appreciated.

Best regards

Dave Finlay  
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Wilhelmsen Ships Service  
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**From:** Przeradzki, Grzegorz  
**Sent:** Friday, April 16, 2010 8:21 PM  
**To:** Finlay, David  
**Cc:** Hestmann, Mats-Petter; Dalmar, Aage; Scheepers, Eddy; Ashton, Alan  
**Subject:** CO2 valve reconditioning

Hello David,

See attached Technical Bulletin - updated and applicable standard, that allows us to perform thread cleaning.

Please confirm you can present this to DOT and get this approved.  
Thanks

<<CGA V9 Valves.pdf>> <<WSE-50-03-018\_Technical bulletin.doc>>

Best regards,

**Grzegorz Przeradzki**  
**QA Manager**  
**Wilhelmsen Ships Equipment**

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