



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JAN 26 2012

Mr. Jerry Swank
Ferrellgas LP
One Liberty Plaza MD# 5
Liberty, MO 64068

Reference No.: 11-0270

Dear Mr. Swank:

This responds to your letter requesting clarification of Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the recordkeeping requirements for Department of Transportation (DOT) specification cylinders that have been visually inspected and requalified. Specifically, you ask whether the actual cylinder dimensions are required to be included on the requalification record specified in § 180.215, when a visual inspection and requalification are performed on DOT specification steel cylinders and low pressure aluminum cylinders.

The answer is yes. The actual cylinder dimensions are required to be included on the requalification record specified in § 180.215. The requirements for reporting and record retention of cylinders, including DOT specification steel cylinders and low pressure aluminum cylinders, are specified in § 180.215. In accordance with § 180.215(b)(2), the date of requalification; serial number; DOT specification or special permit number; marked pressure; actual dimensions; manufacturer's name or symbol; owner's name or symbol, if present; result of visual inspection; actual test pressure; total, elastic and permanent expansions; percent permanent expansion; disposition, with reason for any repeated test, rejection or condemnation; and legible identification of test operator must be included on the requalification record.

You also state in your incoming letter that based on the requirements of the Compressed Gas Association (CGA) Pamphlet C-6 or C-6.3 and § 180.209(g), it is your opinion that the actual dimensions of the cylinder are not required on the requalification record. As noted in your letter, the external visual inspection of a DOT specification cylinder must be completed in accordance with the CGA Pamphlet C-6 or C-6.3, as applicable. However the specific reporting and record retention requirements must be recorded and maintained in accordance with § 180.215. Further, in your letter, you state that § 180.209(g) lists specific information that visual inspection records must include and that this list makes no

mention of actual cylinder dimensions. You are correct that this list does not include actual cylinder dimensions. However, this list is not all encompassing and § 180.209(g) further states that records “must be recorded and maintained in accordance with § 180.215.”

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

Sincerely,

A handwritten signature in black ink, appearing to read "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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



Benedict
§ 180.215
§ 180.209
Cylinders
11-0270

October 21, 2011

Mr. Charles E. Betts
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue, SE East Building, 2nd Floor
Washington, DC 20590

Mr. Betts,

Please accept this letter as our request for an interpretation of 49 CFR 180.215 titled; reporting and record retention requirements. At our facilities we perform visual requalification inspections on both steel and aluminum LPG cylinders. We don't perform any pressure testing or rebuilding of LPG cylinders.

Recently our company received a PHMSA audit. According to the PHMSA Investigator, based on 180.215, we were in violation for not recording the size of cylinders in actual dimensions. He referenced 180.215(b)(2) Pressure test and visual inspection records; stating this required us to record the actual dimensions of the cylinders we performed the visual requalification inspection on.

It is my contention, based on CGA C-6 pamphlets/information to perform visual inspections, recording the actual dimensions of a cylinder is not required. In 5.2.6:1 Measurement (CGA C-6 2007) it explains how cylinders with bulges *can* be measured and what the limits are for cylinders to be condemned. I don't find any where in CGA C-6 or CGA C-6.3 where it states that every cylinder *must* or *shall* be measured for size and recorded. It only states that cylinders with bulges *can* be measured to determine if the amount of bulge would condemn the cylinder.

In 49 CFR 180.209(g) titled; requirements for requalification of specification cylinders, the following verbiage is listed: *Records must include: date of inspection (month and year); DOT specification number; cylinder identification (registered symbol and serial number, date of manufacture, and owner); type of cylinder protective coating (including statement as to need of refinishing or recoating); conditions checked (e.g., leakage, corrosion, gouges, dents or digs in shell or heads, broken or damaged footing or protective ring or fire damage); disposition of cylinder (returned to service, returned to cylinder manufacturer for repairs or condemned)....* Nothing is listed about "actual dimensions" of cylinder.

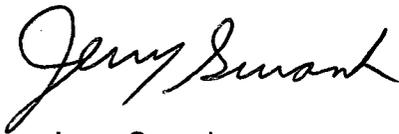
In Appendix A, a sample visual inspection report is shown but does not have a column for listing the size of the cylinder in actual dimensions. I understand this is information only and is not part of the regulation. However, if it is required then wouldn't CGA's sample form have a column to list the actual dimensions of the cylinder?

Please respond to the following question.

1. When performing visual inspection and requalification of specification steel compressed gas cylinders and low pressure aluminum compressed gas cylinders, are the actual dimensions of the cylinder required, by 49 CFR 180.215(b)(2), to be recorded on the requalification record?

Thanks for your time in reviewing my question and interpretation of 49 CFR 180.215. I look forward to your timely reply.

Sincerely

A handwritten signature in cursive script that reads "Jerry Swank".

Jerry Swank
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