



## *CTC Certified Training Co.*

4082 Pioneer Rd.  
Montrose, CO USA 81403  
Tel. (970)240-3391 Fax (970)240-8146  
email: info@ctcseminars.com

I am tired of people telling retesters that they must have the “current” or “most recent” edition of the CGA pamphlets in order to be in compliance.  
I don’t care what you may have been told –

THAT IS NOT CORRECT.

I don’t care if you were told this by CGA,  
Your equipment manufacturer,  
Your third party inspector,  
An FAA inspector,  
Even a DOT INSPECTOR!!  
ANYONE telling you this is mistaken.

THEY NEED TO READ THE REGULATIONS.

Here are the pages from the regulations. First you will see §180.215(a)(6), which clearly states that you must have the information contained in the REFERENCED edition. Some of the referenced editions go all the way back to 1985!! You don’t have to buy the new editions when they come out. However, some Special Permits may reference a later edition, such as the carbon fiber composite SP’s, which say “the latest edition of CGA C-6.2”, since the older edition did not have the carbon fiber information. In this case, you must have the most recent edition.

How do we know which edition is the referenced edition? On the third page of this document you will find §171.7, which lists the referenced editions.

Any questions?

Good.

Get back to work!

### §180.213 (Cont.)

- (6) For designation of DOT 8 series cylinder shell requalification only, the marking is as illustrated in paragraph (d) of this section, except that the "X" is replaced with the letter "S".
- (7) For designation of DOT 8 series and UN cylinder shell and porous filler requalification, the marking is as illustrated in paragraph (d) of this section, except that the "X" is replaced with the letters "FS."
- (8) For designation of a nondestructive examination combined with a visual inspection, the marking is as illustrated in paragraph (d) of this section, except that the "X" is replaced with the type of test performed, for example the letters "AE" for acoustic emission or "UE" for ultrasonic examination.
- (9) For designation of the eddy current examination combined with a visual inspection, the marking is as illustrated in paragraph (d) of this section, except the "X" is replaced with the letters "VE."

### §180.215 Reporting and record retention requirements.

(a) *Facility records.* A person who requalifies, repairs or rebuilds cylinders must maintain the following records where the requalification is performed:

- (1) Current RIN issuance letter;
- (2) If the RIN has expired and renewal is pending, a copy of the renewal request;
- (3) Copies of notifications to Associate Administrator required under §107.805 of this chapter;
- (4) Current copies of those portions of this subchapter applicable to its cylinder requalification and marking activities at that location;
- (5) Current copies of all special permits governing exemption cylinders requalified or marked by the requalifier at that location; and
- (6) The information contained in each applicable CGA or ASTM standard incorporated by reference in §171.7 of this subchapter applicable to the requalifier's activities. **This information must be the same as contained in the edition incorporated by reference in §171.7 of this subchapter.**

(b) *Requalification records.* Daily records of visual inspection, pressure test, and ultrasonic examination if permitted under a special permit, as applicable, must be maintained by the person who performs the requalification until either the expiration of the requalification period or until the cylinder is again requalified, whichever occurs first. A single date may be used for each test sheet, provided each test on the sheet was conducted on that date. Ditto marks or a solid vertical line may be used to indicate repetition of the preceding entry for the following entries only: date; actual dimensions; manufacturer's name or symbol, if present; owner's name or symbol, if present; and test operator. Blank spaces may not be used to indicate repetition of a prior entry. The records must include the following information:

- (1) *Calibration test records.* For each test to demonstrate calibration, the date; serial number of the calibrated cylinder; calibration test pressure; total, elastic and permanent expansions; and legible identification of test operator. The test operator must be able to demonstrate that the results of the daily calibration verification correspond to the hydrostatic tests performed on that day. The daily verification of calibration(s) may be recorded on the same sheets as, and with, test records for that date.
- (2) *Pressure test and visual inspection records.* 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. For each cylinder marked pursuant to §173.302a(b)(5) of this subchapter, the test sheet must indicate the method by which any average or maximum wall stress was computed. Records must be kept for all completed, as well as unsuccessful tests. The entry for a second test after a failure to hold test pressure must indicate the date of the earlier test.
- (3) *Wall stress.* Calculations of average and maximum wall stress pursuant to §173.302a(b)(3) of this subchapter, if performed.
- (4) *Calibration certificates.* The most recent certificate of calibration must be maintained for each calibrated cylinder.

(n) *Compressed Gas Association (CGA)*, 1235 Jefferson Davis Highway, Arlington, VA 22202.

(1) **CGA C-1—2016**, Methods for Pressure Testing Compressed Gas Cylinders, Eleventh edition, copyright 2016, into §§178.36, 178.37, 178.38, 178.39, 178.42, 178.44, 178.45, 178.46, 178.47; 178.50; 178.51; 178.53; 178.55; 178.56; 178.57; 178.58; 178.59; 178.60; 178.61; 178.65; 178.68; 180.205, 180.209.

(2) CGA C-3—2005 (Reaffirmed 2011), Standards for Welding on Thin-Walled Steel Cylinders, Seventh edition, copyright 2005, into §§178.47; 178.50; 178.51; 178.53; 178.55; 178.56; 178.57; 178.58; 178.59; 178.60; 178.61; 178.65; 178.68; 180.211.

(3) **CGA C-5**, Cylinder Service Life—Seamless Steel High Pressure Cylinders, **1991 (reaffirmed 1995)**, into §173.302a.

(4) **CGA C-6—2013**, Standards for Visual Inspection of Steel Compressed Gas Cylinders, Eleventh edition, copyright 2013, into §§172.102, 173.3, 173.198, 180.205, 180.209, 180.211, 180.411, 180.519.

(5) **CGA C-6.1—2013**, Standards for Visual Inspection of High Pressure Aluminum Compressed Gas Cylinders, Sixth Edition, copyright 2013 (corrected 4/14/2015), into §§180.205; 180.209.

(6) **CGA Pamphlet C-6.2**, Guidelines for Visual Inspection and Requalification of Fiber Reinforced High Pressure Cylinders, **1996**, Third Edition, into §180.205.

(7) **CGA C-6.3—2013**, Standard for Visual Inspection of Low Pressure Aluminum Alloy Compressed Gas Cylinders, Third Edition, copyright 2013, into §§180.205; 180.209.

(8) CGA C-7-2014, Guide to Classification and Labeling of Compressed Gases, Tenth Edition, copyright 2014, into §172.400a.

(9) **CGA Pamphlet C-8**, Standard for Requalification of DOT-3HT Cylinder Design, **1985**, into §180.205; 180.209.

(10) CGA C-11—2013, Practices for Inspection of Compressed Gas Cylinders at Time of Manufacture, Fifth Edition, copyright 2013, into §178.35.

(11) **CGA Pamphlet C-12**, Qualification Procedure for Acetylene Cylinder Design, **1994**, into §173.301; 173.303; 178.59; 178.60.

(12) CGA Pamphlet C-13, Guidelines for Periodic Visual Inspection and Requalification of Acetylene Cylinders, 2000, Fourth Edition, into §173.303; 180.205; 180.209.

(13) CGA C-14—2005 (Reaffirmed 2010), Procedures for Fire Testing of DOT Cylinder Pressure Relief Device Systems, Fourth edition, copyright 2005, into §§173.301; 173.323.

(14) CGA G-1.6-2011, Standard for Mobile Acetylene Trailer Systems, Seventh Edition, copyright 2011, into §173.301.

(15) CGA Pamphlet G-2.2, Guideline Method for Determining Minimum of 0.2% Water in Anhydrous Ammonia, 1985, Second Edition, Reaffirmed 1997, into §173.315.