



U.S. Department  
of Transportation

1200 New Jersey Avenue SE  
Washington, DC 20590

**Pipeline and Hazardous  
Materials Safety  
Administration**

**DEC 19 2011**

Mr. Gene Guichu  
Plant Manager  
Allmetal Inc.  
1301 E. Glendale Ave  
Sparks, NV 89431

Ref. No. 11-0251

Dear Mr. Guichu:

This responds to your October 11, 2011 request for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to qualification and maintenance requirements for DOT 107A seamless steel tank car tanks. In your letter, you state that the DOT 107A tank is used to store Helium for manufacturing operations and never offered for transportation. Specifically, you ask PHMSA to clarify the applicability of the test and inspection requirements specified in § 180.519.

Qualification and maintenance requirements for tank cars are specified in Part 180, Subpart F. In accordance with § 180.507, each tank car marked as meeting a "DOT" specification must be compliant with the relevant sections of the HMR applicable to that specification, including qualification and maintenance requirements of Part 180. Section 180.519 sets forth requirements for periodic retest and inspection of tank cars. The tests and inspections described in § 180.519 for DOT 107A tanks must be performed in accordance with the requirements and intervals specified in that section.

I hope this answers your inquiry. If you need additional assistance, please contact this office at (202) 366-8553.

Sincerely,

Ben Supko  
Acting Chief, Standards Development  
Standards and Rulemaking Division

b<sup>n</sup>

**Drakeford, Carolyn (PHMSA)**

**From:** INFOCNTR (PHMSA)  
**Sent:** Tuesday, October 11, 2011 4:29 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Letter of Interpretation

Eichenlaub  
\$173,302  
\$173,306  
\$180,519  
Tank Cars  
11-0251

Hi Carolyn,

We received the following request for a letter of interpretation.

Thanks,  
Victoria

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**From:** Eugene Guichu [<mailto:eguichu@allmetal-inc.com>]  
**Sent:** Monday, October 10, 2011 12:10 PM  
**To:** INFOCNTR (PHMSA)  
**Subject:** Letter of Interpretation

To: Corresponding Department  
Re: Letter of Interpretation

Dear Sirs,

We would like to request a Letter of Interpretation regarding requirements for testing and filling our bulk pressure vessels.

Our current vessels are coded DOT 107A bulk pressure vessels. We have maintained Acoustical Emission Test every five years with no issues. We use them for storage of Helium for our manufacturing operation. The vessels are stored inside our warehouse and do not travel. Based on the codes below please assist in clarifying the test requirements and refill requirements for Helium Gas.

- Title 49: Transportation
- Subpart F Qualification and Maintenance of Tank Cars
- Section 180.519 retest table 1
- Specification 107A

Thank you,

Gene Guichu  
Plant Manager  
Allmetal Inc.  
1301 E. Glendale Ave.  
Sparks, NV 89431  
775-358-6448  
800-824-1372  
[www.equichu@allmetal-inc.com](http://www.equichu@allmetal-inc.com)

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