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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!

ation, 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. Different test sheets shall be used

of Containment for the Handling, Offering for Transport, or Transportation of Dangerous Goods by Rail, into §171.12.

(2) [Reserved]

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

(1) CGA Pamphlet C-3, Standards for Welding on Thin-Walled Steel Cylinders, 1994, 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.

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

(3) **CGA Pamphlet C-6**, Standards for Visual Inspection of Steel Compressed Gas Cylinders, 1993, into §172.102, §173.3, 173.198, 180.205, 180.209, 180.211, 180.411, 180.519.

(4) **CGA Pamphlet C-6.1**, Standards for Visual Inspection of High Pressure Aluminum Compressed Gas Cylinders, 2002, Fourth Edition, into §180.205; 180.209.

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

(6) CGA Pamphlet C-6.3, Guidelines for Visual Inspection and Requalification of Low Pressure Aluminum Compressed Gas Cylinders, 1991, into §180.205; 180.209.

(7) CGA C-7, Guide to Preparation of Precautionary Labeling and Marking of Compressed Gas Containers, Appendix A, issued 2004 (8th Edition), into §172.400a.

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

(9) CGA Pamphlet C-11, Recommended Practices for Inspection of Compressed Gas Cylinders at Time of Manufacture, 2001, Third Edition, into §178.35.

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

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

(12) CGA Pamphlet C-14, Procedures for Fire Testing of DOT Cylinder Pressure Relief Device Systems, 1979, into §173.301; 173.323.

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

(14) 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.

(15) CGA Pamphlet G-4.1, Cleaning Equipment for Oxygen Service, 1985, into §178.338-15.

(16) CGA Pamphlet P-20, Standard for the Classification of Toxic Gas Mixtures, 1995, into §173.115.

(17) CGA Pamphlet P-20, Standard for the Classification of Toxic Gas Mixtures, 2003, Third Edition, into §173.115.

(18) CGA S-1.1, Pressure Relief Device Standards—Part 1—Cylinders for Compressed Gases, (with the exception of paragraph 9.1.1.1), Twelfth Edition, 2005, into §173.301, 173.304a 178.75.

(19) CGA Pamphlet S-1.2, Safety Relief Device Standards Part 2—Cargo and Portable Tanks for Compressed Gases, 1980, into §173.315; 173.318; 178.276; 178.277.

(20) CGA S-7, Method for Selecting Pressure Relief Devices for Compressed Gas Mixtures in Cylinders, 2005, into §173.301.

(21) CGA Technical Bulletin TB-2, Guidelines for Inspection and Repair of MC-330 and MC-331 Cargo Tanks, 1980, into §180.407; 180.413.

(22) CGA Technical Bulletin TB-25, Design Considerations for Tube Trailers, 2008 Edition, into §173.301.

(o) *Department of Defense (DOD)*, 2461 Eisenhower Avenue, Alexandria, VA 22331.

(1) DOD TB 700-2; NAVSEAINST 8020.8B; AFTO 11A-1-47; DLAR 8220.1: Explosives Hazard Classification Procedures, January 1998, into §173.56.

(2) Packaging of Hazardous Material, DLAD 4145.41/AR 700-143/AFJI 24-210/NAVSUPINST 4030.55B/MCO 4030.40B, January 14, 2000, into §173.7.

(p) [Reserved]

(q) *General Services Administration*, Specification Office, Room 6662, 7th and D Street, S.W., Washington, DC 20407.