



September 5, 2023

Docket Management System
U.S. Department of Transportation
Docket Operations, M-30
Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590-0001

RE: Comment to Docket No. PHMSA-2021-0092 (HM-215Q)

To Whom It May Concern:

Nordco is pleased to submit a comment in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Notice of Proposed Rulemaking under Docket No. PHMSA-2021-0092 (HM-215Q).

Nordco commends PHMSA's timely efforts to align the Hazardous Materials Regulations with international regulations and standards as this streamlines the international transportation of hazardous materials.

Nordco apologizes for this late comment but is hopeful the comment may be considered during development of the final rule.

Background

Nordco's comment is related to the incorporation by reference of ISO standards into 49 CFR §171.7.

It has come to Nordco's attention that ISO 18119:2018 *Gas cylinders — Seamless steel and seamless aluminium-alloy gas cylinders and tubes — Periodic inspection and testing* — may merit incorporation into 49 CFR §171.7 as part of the current rulemaking.

ISO 18119:2018 which was published in May of 2018, covers the periodic inspection of both seamless steel and seamless aluminum cylinders and tubes and therefore supersedes ISO 6406:2005 and ISO 10461:2005/A1:2006, covering those types of pressure receptacles. ISO also stated that ISO 6406:2005 and ISO 10461:2005/A1:2006 have been withdrawn from the ISO online catalogue.

ISO 18119:2018 was adapted in the table in 6.2.2.4 of the 22nd revised edition of the UN Model Regulations. Furthermore, previously acceptable standards have been provided and end of use date for phase out has been set as of December 2024 for the acceptance of testing in accordance with ISO 6406:2005 and ISO 10461:2005/A1:2006.

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CSA has approved a draft of CSA B341: 2024 UN pressure receptacles and multiple-element gas containers for the transport of dangerous good which will reference ISO 18119 Amd 1:2021 if approved as drafted later this year superseding ISO 6406:2005 and ISO 10461:2005/A1:2006.

The draft version of UN Model Regulations of the Transportation of Dangerous Goods Rev 23 (2023) ST/SG/AC.10/1/Rev 23(Voll.II) Section 6.2.2.4 references ISO 18119:2018+Amd 1:2021 with the following dates for applicability.

6.2.2.4 *Periodic inspection and test*

The following standards apply to the periodic inspection and testing of UN pressure receptacles:

<u>Reference</u>	<u>Title</u>	<u>Applicable</u>
ISO 6406:2005	Seamless steel gas cylinders – Periodic inspection and testing	Until 31 December 2024
ISO 18119:2018	Gas cylinders – Seamless steel and seamless aluminium-alloy gas cylinders and tubes – Periodic inspection and testing	Until 31 December 2026
ISO 18119:2018 +Amd 1:2021	Gas cylinders – Seamless steel and seamless aluminium-alloy gas cylinders and tubes — Periodic inspection and testing	Until further notice
ISO 10461:2005 + Amd 1:2006	Seamless aluminium-alloy gas cylinders – Periodic inspection and testing	Until 31 December 2024

Comment:

In order to maintain alignment of the Hazardous Materials Regulations with international regulations and standards, Nordco suggests the following be considered in the new rulemaking:

1. Add ISO 18119:2018+ Amd1:2021 to the list of referenced ISO standards in 49 CFR §171.7(w).
2. Revise § 180.207 (d)(1) as follows:
 - (1) Seamless steel: Each seamless steel UN pressure receptacle, including pressure receptacles exceeding 150 L capacity installed in MEGCs or in other service, must be requalified in accordance with ISO 18119:2018 +Amd 1:2021 or unit December 31, 2024 with ISO 6406:2005(E) (IBR, see § 171.7 of this subchapter). However, UN cylinders with a tensile strength greater than or equal to 950 MPa must be



requelified by ultrasonic examination in accordance with ISO 18119:2018 +Amd 1:2021 or unit December 31, 2024 with ISO 6406:2005(E) (IBR, see § 171.7 of this subchapter). For seamless steel cylinders and tubes, the internal inspection and hydraulic pressure test may be replaced by a procedure conforming to ISO 16148:2016(E) (IBR, see § 171.1).

3. Revise § 180.207 (d)(2) as follows:

(2) Seamless UN aluminum: Each seamless aluminum UN pressure receptacle must be requelified in accordance with ISO 18119:2018 +Amd 1:2021 or unit December 31, 2024 with ISO 10461 (IBR, see [§ 171.7 of this subchapter](#)).

Nordco would like to thank PHMSA for the opportunity to provide comments to these important proposed regulations.
Should PHMSA require any additional clarification of Nordco' comment please contact me at your convenience.

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