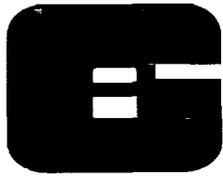


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COMPRESSED GAS ASSOCIATION

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RSPA-2002-12660-1
177717

February 20, 2002

Mr. Edward Mazzullo, Director
Office of Hazardous Materials Standards
U.S. Department of Transportation
Research and Special Programs Administration
400 7th Street SW
Washington, DC 20590

Re: Referencing of CGA V-9 – 2002 Compressed Gas Association Standard for
Compressed Gas Cylinder Valves – Third Edition in 49 CFR Parts 100-180

Dear Mr. Mazzullo,

The Compressed Gas Association (CGA), founded in 1913, represents over one hundred fifty member companies' world wide in the development and promotion of safety standards and safe practices in the industrial gas industry. The Association represents all facets of the industry – manufacturers, distributors, suppliers, and transporters. Through the committee system CGA creates technical specifications, safety standards, training and educational materials; and also works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations.

CGA members produce, market, and distribute industrial gases and cryogenic liquids such as acetylene, carbon dioxide, ethylene, hydrogen, nitrogen, nitrous oxide, and oxygen as well as various specialty gases, many classified as poison gases. Accordingly our members have a strong interest in domestic and international regulations governing these products and the containers in which they are shipped.

CGA respectfully requests that CGA V-9 – 2002 be referenced, at a minimum, in parts 171.7 and 173.34. V-9 covers general cylinder valve design and includes performance requirements such as operating temperature limits, pressure ranges and flow capabilities. The standard informs cylinder valve users, buyers, sellers, manufacturers and others in the safe and proper use of cylinder valves. It includes requirements for maintenance, reconditioning, and testing as needed to ensure that valves are maintained in a safe working condition. It also includes mechanical requirements such as materials, inlet and outlet connections, cleaning, testing, and maintenance. Appendices to this standard cover selection, ordering data, and uses and abuses of cylinder valves.

Mr. Edward Mazzullo, Director
Office of Hazardous Materials Standards
U.S. Department of Transportation

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While 49 CFR 100-180 provides shippers of hazardous materials significant guidance on selection, use, filling and maintenance of compressed gas cylinders, very limited guidance is provide for cylinder valves. The addition of V-9 would provide shippers with much needed information on cylinder valves and be a valuable companion to CGA publication *S-1.1 – 2001 Pressure Relief Device Standards – Part 1 – Cylinders for Compressed Gases*.

The CGA committee responsible for managing this publication is the Cylinder Valve and Connections Committee. The first edition was published in 1991 and this is the third update which now includes additional marking requirements (Sections 5.4.1 and 5.4.4), post type medical valve testing (Section 7.5) and performance requirements for cylinder valve protection caps (Annex E – Normative).

Please contact me with any questions you may have or for any assistance we can provide to achieve approval of our request.

Sincerely,

COMPRESSED GAS ASSOCIATION, Inc,



Roger A. Smith
Technical Director

RS/rs

Enclosures

V-9 – 2001 (4 copies)

cc: Mr. C. Hochman – DOT

Ms. H. Mitchell – DOT

Ms. S. Webb – DOT

Mr. C. Johnson, President CGA (letter only)