



U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
National Policy

**NOTICE
N 8000.357**

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Cancellation Date:
3/16/08

**SUBJ: Oversight Responsibility for Inspection of Hydrostatic Testing of Pressure
Cylinders**

1. PURPOSE. This notice provides guidance to Airworthiness aviation safety inspectors (ASI) regarding the transfer of hydrostatic testing responsibility of pressure cylinders for Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair stations back to the Department of Transportation's (DOT) Research and Special Programs Administration (RSPA).

2. DISTRIBUTION. We will distribute this notice to the division level in the Flight Standards Service in Washington headquarters, including the Regulatory Standards Division at the Mike Monroney Aeronautical Center; to the branch level in the regional Flight Standards divisions; and to all Flight Standards District Offices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avr.faa.gov>. Operators may find this information on the Federal Aviation Administration's (FAA) Web site at: http://www.faa.gov/library/manuals/examiners_inspectors/8000/.

3. BACKGROUND.

a. In 1992 the Aircraft Maintenance Division, AFS-300, and the DOT's RSPA approvals officer of hazardous material safety entered into an agreement which allowed FAA inspectors to assume oversight responsibility for hydrostatic testing facilities under the provisions of Title 49 of the Code of Federal Regulations (49 CFR) part 180, § 180.205, General requirements for requalification of specification cylinders.

b. Since this arrangement was based solely upon the DOT's RSPA facilities being colocated with 14 CFR part 145 repair stations, appropriately trained FAA inspectors were authorized to perform initial or renewal onsite hydrostatic testing inspections on behalf of RSPA. At the conclusion of the inspection the FAA inspector would provide RSPA with a recommendation for approval or denial to meet RSPA's regulatory requirements as outlined in 49 CFR part 107, § 107.805(d), Issuance of requalifier identification number (RIN) and § 107.805(e), Expiration of RIN.

c. On December 20, 2000, a followup meeting was conducted between AFS-300 and RSPA. It was agreed that this delegation of authority was beyond the FAA's jurisdiction and moreover beyond the scope of the FAA Inspector's responsibilities for RSPA's hazardous materials regulations (49 CFR parts 100-185). At the conclusion of this meeting it was decided the FAA would return oversight responsibility of these facilities to RSPA on May 1, 2001. On February 2, 2001, AFS-300 issued a memorandum delineating this agreement. Nevertheless, it has been noted that hydrostatic testing is still being performed under improperly issued limited specialized service ratings approved within a repair station's operations specifications (OpSpecs).

Distribution: A-W(FS)-2; A-X(FS)-3; A-FFS-7 (LTD); AMA-200 (12 cys)
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Initiated By: AFS-300

4. DISCUSSION.

a. The FAA understands that many 14 CFR part 145 repair stations have the necessary equipment, personnel, and training to perform hydrostatic testing. However, the appropriate authority to oversee such activity is the DOT's RSPA office. The rationale for this decision lies within 49 CFR part 107, § 107.805, Approval of cylinder and pressure receptacle requalifiers.

b. The above notwithstanding, there could be situations where inspections not including hydrostatic testing of a pressure cylinder may be within the purview of the FAA. For instance, if a pressure cylinder is certified as part of an aircraft system, an appropriately rated 14 CFR part 145 repair station may perform maintenance and inspection on it as long as the process is in accordance with the 14 CFR part 121 or 135 operator's Continuous Airworthiness Maintenance Program or the Aircraft Maintenance Manual. This is not to be construed as approval to rate any repair station to perform hydrostatic testing. If a cylinder is removed from an aircraft system for testing, it must be retested and re-qualified (or rejected and condemned) as prescribed in 49 CFR § 180.205.

5. GUIDANCE. Field offices should notify their respective repair stations to contact DOT's RSPA, 400 7th Street, S.W., Washington, DC, 20590, (202) 366-0656, for all hydrostatic testing approvals (initial or renewal).

6. ACTION. ASIs will advise repair stations that have ratings and/or limitations for hydrostatic testing that those OpSpecs will be amended to remove hydrostatic testing ratings and/or limitations. Within 180 days of the date of this notice ASIs will remove hydrostatic testing as a rating or limitation from repair stations OpSpecs. Certification of hydrostatic testing facilities will remain with DOT's RSPA.

7. DISPOSITION. We will permanently incorporate the information in this notice in FSIMS before this notice expires. Questions concerning this notice should be directed to AFS-340 at (202) 267-7424.



James J. Ballough
Director, Flight Standards Service