



Dear CPA Members,

There is some confusion with interpreting [Subsection 5.10\(2\) of the Transportation of Dangerous Goods \(TDG\) Regulations](#). This Subsection states that a cylinder used to transport dangerous goods (Class 2, Gases) in Canada must satisfy ONE of three options:

#1 - 5.10(2)(a) The cylinder is manufactured in accordance with CSA B339 - *Cylinders, Spheres, and Tubes for the Transportation of Dangerous Goods*. Only cylinders marked with a Transport Canada (TC) specification satisfy this option. These cylinders must be requalified by a TC-registered requalifier in accordance with CSA B339.

OR

#2 - 5.10(2)(b) The cylinder is authorized for continued use in accordance with an older version of the TDG Regulations. The Transport Canada website now provides a link to the applicable sections of these Regulations.

These Regulations essentially allow the following cylinders to be used as long as they are requalified in accordance with CSA B339 and were manufactured prior to December 31, 1992 in accordance with one of the following:

- CRC, BTC, CTC, or TC specification cylinders.
- Cylinders manufactured to CTC Special Permits.
- Cylinders manufactured in accordance with CFR 49 or a Department of Transport (DOT) exemption and in use in Canada before January 1, 1993 and marked with "ICC" or "DOT".

OR

#3 - 5.10(2)(c) The cylinder is manufactured before 1993 in accordance with 49 CFR and requalified in accordance with 49 CFR or CSA B339. The cylinder specifications in (i) and (ii) DO NOT APPLY to this option. Since the cylinder specifications in (i) and (ii) do not satisfy 5.10(2)(a), these cylinders can only be used if they satisfy 5.10(2)(b).

For example:

- A DOT-3AA specification cylinder manufactured in 1990 could be used under the provisions of Paragraph 5.10(2)(c). The only condition is that this cylinder must be requalified by a facility registered with Transport Canada (B339) or a facility registered with the US DOT (49 CFR).
- A DOT-4BA specification cylinder manufactured in 1990 could only be used under the provisions of Paragraph 5.10(2)(b) if it is requalified by a facility registered with Transport Canada and was in use in Canada before January 1, 1993. Paragraph 5.10(2)(c) does not apply since this specification is identified in 5.10(2)(c)(i).
- A DOT-4BA specification cylinder manufactured in 1996 does not satisfy any of the conditions in Subsection 5.10. This cylinder cannot be used in Canada.

For any questions, please contact Mélanie Levac, CPA Senior Director, Policy and Regional Manager, Atlantic, at 613.683.2274 or melanielevac@propane.ca.

Thank you.

616-130 rue Albert St., Ottawa ON K1P 5G4 (613) 683-2270

www.propane.ca | Twitter: @canadapropane

Your Energy Solution for Today and Tomorrow | Votre solution énergétique pour aujourd'hui et demain