



Steven W. Troxler
Commissioner

North Carolina Department of Agriculture
and Consumer Services
Standards Division

Stephen Benjamin
Director

December 30, 2011

Carolinas Balloon Association
Attention: Robert Wise, President
344 Wilson Street
Statesville, NC 28677

Dear Mr. Wise:

This letter is in response to questions from your association regarding the certification of qualified hot air balloon pilots to fill the propane containers used in hot air balloons. This is a restatement of a position issued from this office on April 8, 1993.

We have reviewed some of the flight manuals where refueling procedures are specified, spoken with an FAA designee who was active as a balloon pilot certification official, and spoken with a current FAA official who verified that refueling procedures are in the practical tests standards for balloon pilots. All of these indicate that balloon pilots are required to know proper filling procedures and are tested on those procedures.

I observed one pilot as he refueled his propane flight cylinders. His explanation of the fuel system operation and safety features demonstrated his understanding of the fuel system. His explanation and actions as he filled his cylinders showed that he knew the characteristics of propane, understood when a cylinder was properly filled, knew how to recognize hazards in the vicinity of his filling activity, and understood what to do in various scenarios where hazards suddenly appear.

Since FAA Balloon Pilot Certification includes thorough knowledge of all flight manual information and procedures, and since all flight manuals include appropriate propane cylinder filling procedures, it is our interpretation and ruling that FAA Balloon Pilots Certification meets the qualification of personnel requirements of paragraph 4.4 of NFPA 58, the *LP-Gas Code* (2011 edition). FAA Balloon Pilot Certification is a valid qualification to fill propane containers used in hot air balloons. Pilot re-certification is required every two years, so a pilot with a current certification meets the refresher training requirements of the *LP-Gas Code*. Note that this interpretation and ruling are valid only in North Carolina.

While this department considers a balloon pilot qualified to fill his cylinders without supervision, we do not impose this condition on any dispenser location. Each location must make that determination for themselves and may require additional training specific to their particular type of dispensing equipment.

Please feel free to contact me if you have any questions.

Sincerely,

Richard G. Fredenburg
LP-Gas Engineer