



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

October 1, 2020

Kevin Funk
Shipping Tech Lead
Linde Gas N.A., LLC
470 West Antelope Road
White City, OR 97503

Reference No. 20-0067

Dear Mr. Funk:

This letter is in response to your August 25, 2020, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to an exception for labeling cylinders. Specifically, you ask for clarification on the proper use of CGA C-7-2014, *Guide to Classification and Labeling of Compressed Gases* regarding: (1) the option to use a reduced size label; and (2) the correct placement of a reduced size label on the cylinder (i.e., the shoulder or the sidewall). Lastly, you included a picture with your email demonstrating an example of a cylinder with a reduced size label.

With respect to the Part 172, Subpart E labeling requirements, the general requirement for the placement of a label is that it must be printed on or affixed to a surface (other than the bottom) of the package (see § 172.406(a)(1)(i)). Further, as provided by § 172.407(c), the size requirement states that the label must be at least 100 mm by 100 mm; however, if the size of the package so requires, the dimensions of the label and its features may be reduced proportionally provided the symbol and other elements of the label remain clearly visible.

With respect to the use of CGA C-7-2014, in accordance with § 172.400a, a label is not required on a cylinder containing a Division 2.1, 2.2, or 2.3 material that is durably and legibly marked in accordance with CGA C-7-2014, Appendix A (IBR, see § 171.7). CGA C-7-2014, Appendix A requires a basic marking consisting of a diamond-shaped figure indicating the hazard class of the contained gas combined with a panel containing the DOT proper shipping name of the contained gas and the UN identification number. The panel must be located to the left of the diamond (see section A.2, DOT/TC labels and markings). Further, CGA C-7-2014, Appendix A provides for a reduced size label by stating the diamond figure in the basic marking must measure at least 30 mm (1.25 in) on each side (see section A.4, DOT/TC label dimensions and modifications). Finally, the basic marking (which includes the reduced size label) must be located: (a) when space permits, on the shoulder of the cylinder but not covering the current test date, requalification date or any other required permanent markings; or (b) on the side of the

cylinder at a point approximately two thirds of the distance from the cylinder bottom to the top of the valve or cap (see section A.7, Additional requirement). Therefore, when conforming to CGA C-7-2014, the label may be reduced in size and may be located on the side of the cylinder without consideration of the size of the cylinder.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen". The signature is fluid and cursive, with a prominent initial "D".

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

