



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DEC 20 2018

Mr. Raj Kasbekar  
Vice President, Regulatory Affairs  
Helen of Troy, Health & Home  
400 Donald Lynch Boulevard  
Suite 300  
Marlborough, MA 01752

Reference No. 18-0145

Dear Mr. Kasbekar:

This letter is in response to your November 26, 2018, email and subsequent phone call requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to hazard communication requirements for packages containing lithium button cell batteries installed in equipment. You describe a shipment of CR1225 or DL2032 lithium button cell batteries installed in equipment and the lithium content of each CR1225 or DL2032 battery does not exceed 1 gram. You state that the consignment contains more than two packages and may contain as many as 50 lithium button cell batteries installed in equipment. Specifically, you ask whether the packages must display the lithium battery mark described in § 173.185(c)(3).

The answer is no. Packages containing only lithium button cell batteries installed in equipment, including circuit boards, that comply with the requirements of § 173.185(c) are not required to display the lithium battery mark. This applies regardless of the number of packages per consignment, the number of pieces of equipment per package, or the number of lithium button cell batteries installed in each piece of equipment.

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

Sincerely,

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