



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

January 6, 2022

Mr. Justin Wai  
High Precision Gas  
10770 Painter Avenue  
Santa Fe Springs, CA 90670

Reference No. 21-0090

Dear Mr. Wai:

This letter is in response to your September 8, 2021, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to cylinder markings. Specifically, you ask whether a cylinder may have a marking with the proper shipping name of “UN1075, Petroleum gases, liquefied, 2.1,” as well as a secondary marking of “Butane.”

In accordance with 49 CFR 172.301(a)(1), each person who offers a hazardous material for transportation in a non-bulk packaging must mark the package with the proper shipping name and identification number for the material contained within, as shown in the § 172.101 Hazardous Materials Table. However, special provision 19 permits use of the identification number “UN1075” in place of “UN1011” for butane in domestic transportation only. Based on the information provided in your email, your hazardous material may be described and marked as either “UN1075, Petroleum gases, liquefied, 2.1,” or “UN1075, Butane, 2.1.” The identification number used must be consistent on package markings, shipping papers, and emergency response information.

While the HMR do not prohibit the inclusion of “Butane” as a secondary marking in addition to the proper shipping name of either “UN1075, Petroleum gases, liquefied, 2.1,” or “UN1075, Butane, 2.1,” this may cause confusion in transportation and result in the frustration of your shipment.

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

Sincerely,

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Hazmat Interps](#)  
**Subject:** FW: Interpretation on LPG Cylinder labeling  
**Date:** Wednesday, September 8, 2021 4:38:29 PM  
**Attachments:** [image.png](#)

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Below is a request for letter of interpretation.

Thanks,

Jonathon, HMIC

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**From:** Justin@HPG <[justin@highprecisiongas.com](mailto:justin@highprecisiongas.com)>  
**Sent:** Wednesday, September 8, 2021 3:57 PM  
**To:** INFOCNTR (PHMSA) <[INFOCNTR.INFOCNTR@dot.gov](mailto:INFOCNTR.INFOCNTR@dot.gov)>  
**Subject:** Interpretation on LPG Cylinder labeling

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi,

Is it okay to have two proper shipping names on the same LPG cylinder like in the picture below? For example, having 'Liquefied Petroleum Gas' on the main label with a separate label that has additional property information on it such as 'Butane'.



Respectfully,



**JUSTIN WAI**  
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10770 Painter Ave. Santa Fe Springs, CA 90670

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