



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

JUN 16 2004

Mr. A. B. Eargood  
Brenntag Stinnes Logistics  
P. O. Box 20  
Henderson, KY 42420

Reference No.: 04-0102

Dear Mr. Eargood:

This is in response to your letter concerning the labeling requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the labels required by § 172.406 on DOT 106 or 110 multi-unit tank car tanks may be stenciled on each end of the tank car tank. In a conversation with a member of my staff, you stated that the cylinders for the chlorine and sulfur dioxide are painted gray and light green respectively. You propose to paint the ends of the cylinders white and stencil the labels in the white area.

The answer is yes provided the stenciled labels fully conform to all requirements for durability, design, size and color specified in §§ 172.407, 172.416, and 172.442.

I trust this satisfies your request.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



040102

172.406



Corbin  
§172.406  
Labeling  
04-0102

Brenntag Mid-South, Inc.

EDWARD MAZZULLO  
DIRECTOR OF HAZARDOUS MATERIAL STANDARDS  
U.S. DEPARTMENT OF TRANSPORTATION  
400 7th STREET SW  
WASHINGTON, DC 20590-0001

DEAR MR. MAZZULLO,

BRENNTAG MID-SOUTH, INC. TRANSPORTS DOT 106 CYLINDERS CONTAINING CHLORINE UN1017 AND SULFUR DIOXIDE UN1079 WHICH REQUIRE A INHALATION HAZARD AND A CORROSIVE LABEL TO BE DISPLAYED ON EACH END OF THE CYLINDERS. REGULATION 172.406(e) (3).

BRENNTAG TRANSPORTS THESE CYLINDERS BY FLAT BED TRAILERS. WE HAVE FOUND THAT RETAINING LABELS ON EACH END OF THE CYLINDERS HAS BEEN A PROBLEM.

WE HAVE CHANGED TAG MATERIAL, GROMMETS AND WIRE, BUT STILL LOOSE TAGS IN TRANSIT.

MY QUESTION IS, CAN A STENCIL BE USED ON EACH END OF THE CYLINDER INSTEAD OF A TAG?

THE STENCIL WOULD BE THE SAME AS THE TAG (COPY ATTACHED) WE ARE NOW USING.

A PERMANENT TAG ON EACH END OF THE CYLINDERS WOULD ELIMINATE THE DRIVER HAVING TO STOP ON THE SIDE OF THE ROAD TO REPLACE TAGS THAT HAVE BLOWN OFF.

THE COLOR OF THE CHLORINE UN1017 IS GRAY AND THE COLOR OF THE SULFUR DIOXIDE UN1079 IS LIGHT GREEN. TO COMPLY WITH THE REGULATIONS A WHITE AREA WOULD BE PAINTED ON EACH END OF THE CYLINDERS AND THE STENCIL WOULD BE PLACED OVER THE WHITE WITH THE BLACK ROLLED ON FORMING THE LABEL. *color of cyl.*

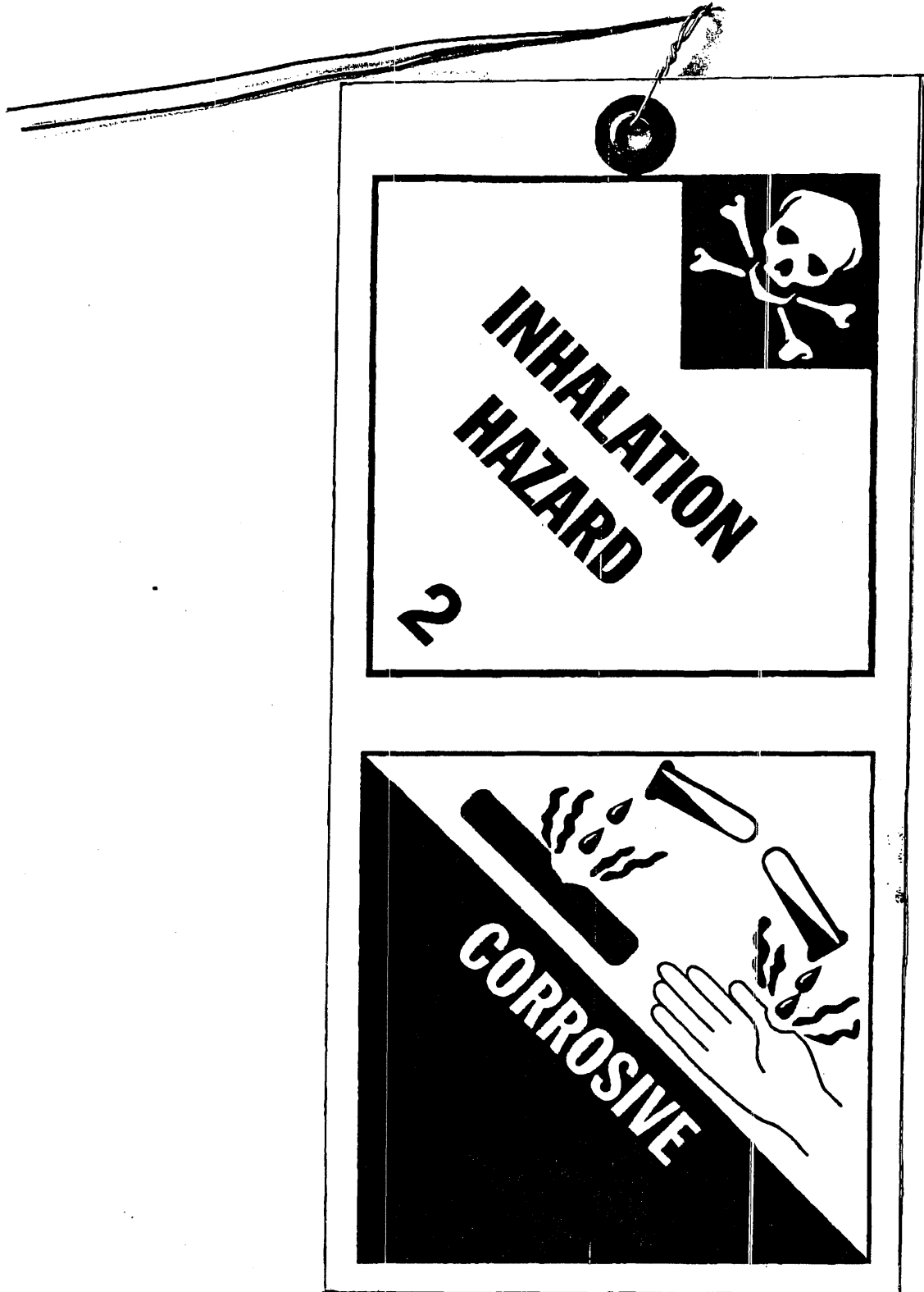
I APPRECIATE YOU LOOKING INTO THIS MATTER AND AWAIT YOUR RESPONSE.

THANK YOU,  
*A B EARGOOD*  
A B EARGOOD

BRENNTAG MID-SOUTH, INC.  
1405 HWY 136 WEST  
P O BOX 20  
HENDERSON, KY 42420  
A B EARGOOD  
270-830-1318  
FAX 270-826-1486  
beargood@brenntag.com

Brenntag Mid-South, Inc.  
1405 Highway 136 West  
P.O. Box 20  
Henderson, KY 42419-0020

BRENNTAG MID-SOUTH, INC.



**INHALATION  
HAZARD**  
2

**CORROSIVE**

**BRENNTAG**  
Stinnes Logistics



Brenntag Mid-South, Inc.

FAX

TO: EDWARD MAZZULLO

DATE: 04/19/04

FAX# 202-366-3012

NUMBER OF PAGES: 3

FROM: A.B.EARDOOD

PHONE: 270-830-1318

FAX# 270-826-1486

E-MAIL beargood@brenntag.com

LETTER AND TAG ATTACHED

Brenntag Mid-South, Inc.  
1405 Highway 136 West  
PO. Box 20  
Henderson, KY 42419-0020