



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

SEP 6 2007

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

Mr. Chris Meeks  
Alcoa KAMA  
1050 Sycamore Rd.  
Manteno, IL 60950

Ref. No. 07-0067R

Mr. Meeks:

This is in further response to our July 28, 2007 reply to your March 30, 2007 letter concerning limited quantity shipments of compressed gases transported by highway. A further review of this issue indicates a need to clarify our previous response.

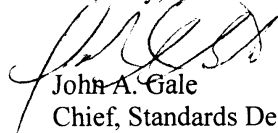
Your letter stated that § 173.306 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) provides labeling and packaging exceptions for compressed gases only when offered as a limited quantity not exceeding a gross weight of 30 kg (66 pounds). Your letter also stated that a 55-gallon steel drum (1A2) used as an outer packaging to contain aerosols and having a gross weight over 30 kg (66 pounds) may be offered and transported by highway, provided all applicable labeling and packaging requirements are maintained. You asked whether your interpretations were correct.

In our response, we indicated that when transported by highway, § 173.306 excepts limited quantities of certain compressed gases from: (1) labeling (except when intended for further transportation by air); and (2) specification packaging requirements when packaged in accordance with paragraphs (a)(1) through (a)(4) of § 173.306, unless required as a condition of the exception. Each package may not exceed 30 kg (66 pounds) gross weight. In addition, these shipments are not subject to: subpart F (Placarding) of part 172; part 174, except § 174.24; and part 177, except § 177.817.

It was not our intention to imply that a 55-gallon steel drum is an acceptable packaging for aerosols. The only packaging section for this material is § 173.306 as indicated under the "Exceptions" column of the HMT. The HMR does not authorize aerosols to be transported in a package with a gross weight that is greater than 30 kg (66 pounds).

I hope this information is helpful.

Sincerely,



John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



070067R

173.306(a)



Foster  
§173.306(a)  
Cylinders  
07-0067

**Alcoa**

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March 23, 2007

Mr. Edward T. Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
400 7th Street S.W.  
Washington, D.C. 20590-0001

**RE: Request for clarification of 49 CFR 173.306(a)**

Dear Mr. Mazzullo:

I am requesting clarification of section 49 CFR 173.306(a) concerning shipments over the highway of limited quantities of compressed gases. Please verify the following information so that my understanding of this section is correct.

- Section 49 CFR 173.306(a) provides labeling and packing exceptions to part 172 for compressed gases only when offered as a limited quantity not exceeding a gross weight of 30 kg (66 pounds)
- A fifty-five gallon steel drum (specification 1A2) used as an outer packing for containing aerosols and having a gross weight in excess of 30 kg (66 pounds) may be offered and shipped over the highway provided that all applicable labeling and packing requirements of part 172 are obeyed.

Please advise. My mailing address can be found in header of this letter.

Sincerely,

Chris Meeks  
EHS Manager  
Alcoa Kama