



U.S. Department  
of Transportation

Pipeline and Hazardous  
Materials Safety  
Administration

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

OCT 20 2016

Ms. Tammy King  
Label Solutions, Inc.  
P.O. Box 12  
Marshfield, MO 65706

Reference No. 16-0089

Dear Ms. King:

This letter is in response to your May 18, 2016, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to cylinder labels. You note that Compressed Gas Association (CGA) C-7, Appendix A, A.4, indicates that the hazard class text (e.g., "flammable gas") is not required but is allowed by the HMR. Specifically, you ask if it is acceptable for the words "flammable gas"—when placed in the transportation diamond as illustrated in CGA C-7, Appendix A—to be on two lines rather than one line as it appears in § 172.417 of the HMR.

The answer is no. The HMR allow exceptions to labeling under § 172.400a for 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, Appendix A. In addition, cylinders containing a flammable gas can use the label prescribed in § 172.417 of the HMR. Neither CGA C-7, Appendix A, nor the HMR allow the hazard class text to be displayed on two lines.

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

Anclaus  
172.417  
Flammable Gas Label  
16-0089

**Goodall, Shante CTR (PHMSA)**

**From:** Rivera, Jordan CTR (PHMSA)  
**Sent:** Wednesday, May 18, 2016 3:35 PM  
**To:** Hazmat Interps  
**Subject:** FW: Request for letter of interpretation

Hi Shante/Alice,

Please submit this for a letter of interpretation. I spoke with Ms. King.

Please let me know if you have any questions.

Thanks,  
Jordan

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**From:** Tammy King [<mailto:tking@easylabeling.com>]  
**Sent:** Wednesday, May 18, 2016 10:40 AM  
**To:** INFOCNTR (PHMSA)  
**Subject:** Request for letter of interpretation

To Whom It May Concern,

I am writing to request a letter of interpretation regarding the format of the transportation diamond as used in the CGA C-7 marking system as outlined in the CGA C-7 Appendix A section A.8.

The CGA C-7 Appendix A A.4 mentions that hazard class words are not required but are allowable. In section A.8 on the illustrative example does not contain the word "gas" but it is noted that the word may be included but does not specify where inside the diamond it should be placed.

My question is, when using the hazard class words in the transportation diamond (e.g. flammable gas) as illustrated in CGA C-7 Appendix A, is it acceptable for the words to be on two lines rather than one line as it appears in 49 CFR 172.417 in the illustrated example for labeling?

Regards,

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