



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JAN 14 1999

Mr. Jim Glessner
COSBO
1310 Beaver Road
Sewickley, PA 15143-2008

Ref. No. 98-0377

Dear Mr. Glessner:

This is in response to your letter dated December 14, 1998, regarding whether your modular label, for placement on the shoulder of compressed gas cylinders, is in compliance with the labeling requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You enclosed a sample of your company's modular label system and stated that these labels were modeled after the examples provided in the CGA Pamphlet C-7, Figure 3.

As you are aware, a cylinder containing a compressed gas that is not poisonous, carried by a private or contract motor carrier, not overpacked, and durably and legibly marked in accordance with CGA Pamphlet C-7, Appendix A, is excepted from the labeling requirements of the HMR. In accordance with the requirements of 49 CFR 172.400a(a)(1), these markings are recognized as an alternative to labeling under the HMR.

Your company's "modular label system" does not meet the requirements in the CGA Pamphlet C-7, Appendix A, Figure 3. Therefore, these modular labels are unacceptable and may not be used to meet the exceptions to labeling specified in 49 CFR 172.400a(a)(1).

You may wish to contact the CGA to inquire about getting your "modular label system" incorporated in the CGA system of markings for compressed gas cylinders, or petition for rulemaking under 49 CFR 106.31 to amend the requirements to allow for use of the modular labels.

I hope this satisfies your inquiry.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards

172.400

98-0377

COSBO www.cosbo.com	COSBO Industrial Design & Technology Consortium	
	1310 Beaver Road	412-366-9045 voice
	Sewickley, PA 15143-2008	412-741-6010 fax

December 14, 1998

Mr. Edward T. Mazzullo, DHM-10
 Director of Office of Hazardous Materials Standards
 US DOT/RSPA
 400 7th St. N.W.
 Washington, DC 20590-0001

ENGRUM
 172.400a

Re: Request for DOT Letter of Interpretation for Modular Label System (Sample Enclosed)

Dear Mr. Mazzullo:

I have talked with Helen Ingrum and Del Billings of your department concerning the Modular Label System we have created for gas cylinder shoulder labels based on CGA C-7 (CGA Marking System for Compressed Gas Cylinders). They advised me to write you for a letter of interpretation. This new system is designed to solve some problems associated with the labeling of compressed gas cylinders as described in the paragraphs that follow.

The shoulder of compressed gas cylinders contains information that is indelibly stamped into the cylinder wall, which cannot be covered. Typically labels that contain all the product information in one contiguous piece make it difficult if not impossible sometimes to find a spot on the shoulder that is large enough to accommodate the label. The modular label has separate pieces which may be placed in proximity to each other but can be adjusted to fit the landscape (not cover important information) of the cylinder.

Because the shoulder (the crown) area of the cylinder is curved it requires curved labels to fit properly. The modular label has separate pieces that are organic (slanted to fit) so that the final composition of pieces looks like it belongs together. To help the composite design look like one label all modular pieces are outlined in black and have the same overall look to them. The modular labels have no curved type. This allows for more readable information.

It is difficult to place vinyl labels onto cylinders without wrinkling them. The modular label allows for smaller pieces to be placed on the cylinder without as much danger of wrinkling due to the smaller size. In turn if a single label becomes damaged it must be replaced. Modular labels allow replacing the damaged part without affecting the rest of the composition.

Most importantly the modular label contains one central label with DOT, OSHA, and FDA required information. A separate Technical Names label (see sample 75% Argon, 25% Carbon Dioxide) is placed next to it. When the cylinder is changed to another compatible mixture (like 85% Argon, 15% Carbon Dioxide) only the Technical Names label must be changed.

December 14, 1998

Page Two

These labels are modeled after the required formats in CGA C-7. I have enclosed a copy of page 42 of that pamphlet which illustrates the basic model that was followed. In addition there is a page I created that shows different combinations of the modular labels on a cylinder as they fit around the main compliance label in the center.

I have asked Mr. Bob Ackerman who is the DOT Traffic consultant to the National Welding Supply Association to comment on this new modular label system. His response was favorable. He also advised me to get your interpretation of fitness.

Please keep in mind that numerous labels get attached to cylinders in the marketplace today. Only one contains the regulatory information that is important to the customer. That label we feel should be central to the overall composition of labels on the cylinders. Before this system it was very difficult for end users to know which label contains the important safety and emergency response information because marketing, bar-coding, and other general information labels compete for their attention. The Modular Labeling System makes the regulatory compliance portion of the label the focal point.

I was told that it takes approximately six weeks for an interpretation letter to be returned. We do appreciate your timely response. Towards that end I am willing to visit with you if you have questions or would like to see modular label samples placed on a compressed gas cylinder. I live just 4 hours from the beltway so it is not an inconvenience to visit with you if that would help expedite the process.

Please let us know if you have any questions. Thank you for your attention to this matter.

Best regards,

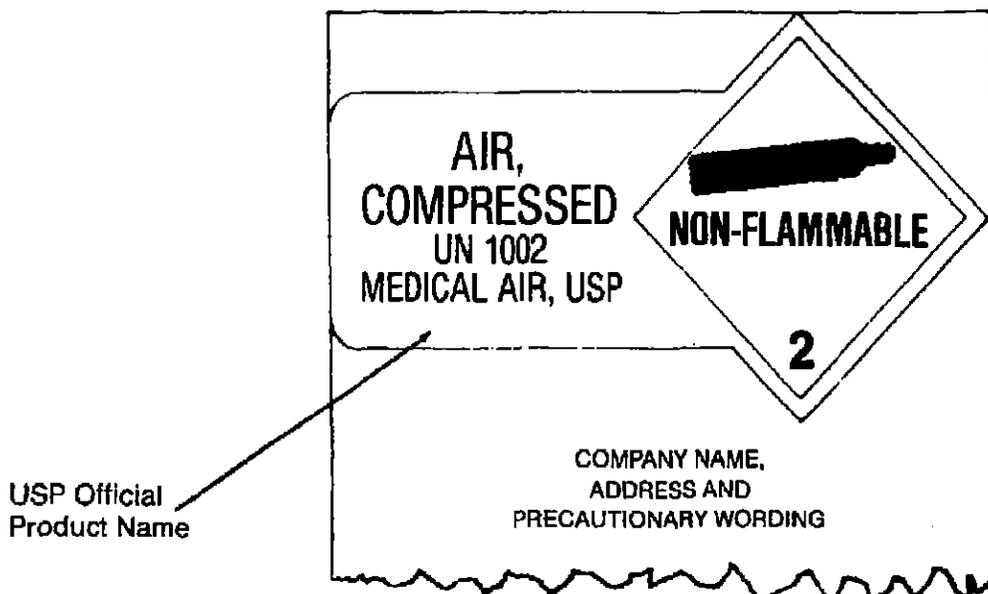
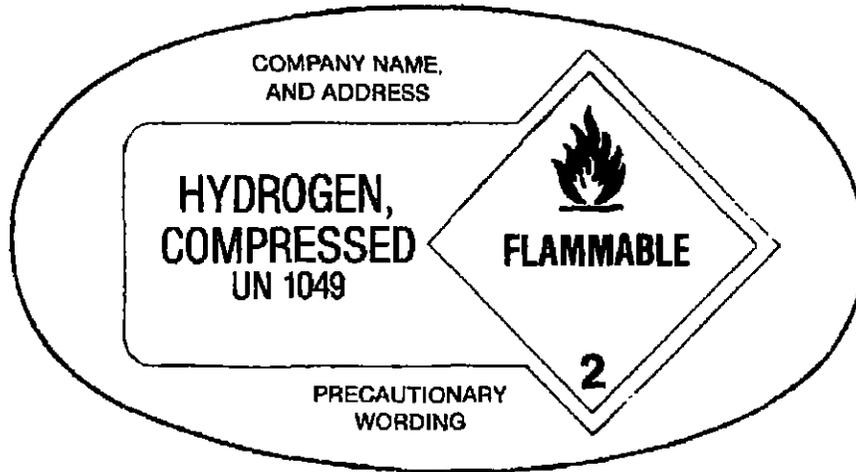


Jim Glessner
Technology Architect

Cc: Mr. Scott Downey, Downey Decal & Graphics Co.
Mr. Bob Ackerman, Loss Control Associates

Enclosure: Sample, CGA-C7 page 42, and Modular Label Layout Variations

FIGURE 3
EXAMPLES OF CGA MARKING SYSTEM



NOTE: When required by the U.S. FDA or Health and Welfare Canada the "USP/NF" marking may appear either directly above, below, or beside the proper shipping name in the panel.