



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

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

MAY 12 2006

Mr. G. A. Hayden, PE
CP Industries
2214 Walnut Street
McKeesport, PA 15132-7098

Ref. No. 06-0104

Dear Mr. Hayden:

This is in response to your April 21, 2006 letter requesting clarification regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to the marking of cylinders. Specifically, you ask if a DOT specification cylinder may contain additional Chinese markings as displayed in your attached cylinder drawing.

The answer is yes. Section 178.35(f)(6) authorizes additional markings on specification cylinders provided they are made in low stress areas other than the sidewall, not of a size and depth that will create harmful stress concentrations, and do not conflict with any DOT markings.

I hope this information is helpful.

Sincerely,

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



060104

178.35-



CP INDUSTRIES

A Division of Reunion Industries, Inc.

2214 Walnut Street
McKeesport, PA 15132-7098
Tel: 412-664-6604

Satterthwaite
§ 178.35

Markings
06-0104

April 21, 2006

Ms. Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards
U.S. Department of Transportation
Research and Special Programs Administration
400 Seventh St., SW
Washington, DC 20590

Dear Ms. Mitchell,

CP Industries manufactures DOT 3AA, 3AAX, and 3T containers in accordance with 49 CFR Parts 178.35, 178.36, and 178.45.

We have been requested by representatives of the Peoples Republic of China to place additional markings on DOT 3AA, 3AAX, and 3T containers which are produced for shipment to China. Attached drawing SK 1012 shows the normally used stamp markings per DOT 49 CFR 178 on the right end of the cylinder and the proposed China stamping on the left end of the cylinder.

Does such a request violate any provisions of 49CFR Part 178.35 (f), which pertains to markings? (Particularly 178.35 (f)(1) (i), (ii), and (iv), and also 178.35 (f)(6))?

Note that we would propose to locate the requested Chinese markings always on the opposite end of the cylinder from the DOT required markings.

Your interpretation of the acceptability of the requested marking would be very much appreciated.

Yours very truly,

CP INDUSTRIES

G. A. Hayden, PE
Chief Metallurgist/ Director QA