



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

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

1200 New Jersey Ave., S.E.
Washington, DC 20590

JUN 28 2007

Ref. No. 07-0067

Dear Mr. Meeks:

This is in response to your March 23, 2007 letter concerning limited quantity shipments of compressed gases under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you request verification of your understanding of the exceptions provided for limited quantities of compressed gas when transported by highway.

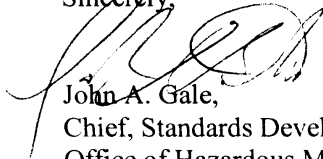
In your letter, you state that § 173.306 provides labeling and packaging exceptions for compressed gases only when offered as a limited quantity not exceeding a gross weight of 30 kg (66 pounds). In your letter, you also state a 55-gallon steel drum (1A2) used as an outer packaging to contain aerosols 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 ask whether your interpretations are correct.

The answer is yes. 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.

In addition, a 55-gallon steel drum 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. However, because the gross weight exceeds 30 kg (66 pounds), the limited quantity exceptions of § 173.306 would not apply, and all other applicable requirements in the HMR must be met, including labeling, placarding, and marking.

I hope this information is helpful.

Sincerely,



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



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173.306



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