



COMPRESSED GAS ASSOCIATION, INC.

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Docket Management System
U.S. Department of Transportation
Room PL-401
400 Seventh Street S.W.
Washington, DC 20590-0001

Subject: Docket No. RSPA-03-15327 (HM-206B)

Gentlemen:

The Compressed Gas Association (CGA) is pleased to submit the following comments in response to Docket RSPA-03-15327 (HM-206B).

The CGA, founded in 1913, represents over one hundred member companies world wide in the development and promotion of safety standards and safe practices in the industrial gas industry. The Association represents all facets of the industry – manufacturers, distributors, suppliers, and transporters. Through the committee system CGA creates technical specifications, safety standards, training and educational materials; and also works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations.

CGA members produce, market, and distribute industrial gases and cryogenic liquids such as carbon dioxide, ethylene, hydrogen, nitrogen, nitrous oxide, and oxygen as well as various specialty gases, many classified as poison gases. Accordingly our members have a strong interest in domestic and international regulations governing these products.

CGA supports the proposal to allow common carriers to transport cylinders with shoulder labels in conformance with CGA Publication C-7, "Guide to the Preparation of Precautionary Labeling and Marking of Compressed Gas Containers". This allowance will permit ease of identifying specific gases, extend the life of the labeling by reducing the possibility of rubbing the label off, and harmonize, to some degree, with international regulations.

CGA believes that, in addition to marking containers shown in §§172.301, 172.326, 172.328 and 172.328 as containing non-odorized Liquefied petroleum gas (LPG); a similar notation should also be shown on the shipping papers. This would provide uniformity between the container marking and the shipping description and would also benefit emergency responders.

CGA asks that the proposed cut off date in 171.14 (a) (1) of October 1, 2004 be extended for a longer period of time to allow cylinders already in the field to be returned. It is not unusual for a cylinder to be stored or used for periods exceeding one year.

CGA appreciates the opportunity to comment on this important rulemaking and looks forward to a favorable response to our comments.

Very truly yours,

COMPRESSED GAS ASSOCIATION

A handwritten signature in black ink, appearing to read "R.J. McGrath", with a long, sweeping horizontal line extending to the right.

R.J. McGrath
Technical Manager