



MEMORANDUM

September 25, 2006

To: All OSHA

From: Peggy Munsell
Manager, Standards and Technical Services

Subject: Compressed Air Pipe Labelling

Recently, a question came up asking if the pipe labelling rules apply to compressed air lines. The scope of 437-002-0378, "Oregon Rules For Pipe Labelling," states "This division shall apply to all piping systems containing hazardous substances or that use asbestos as a pipe insulation material in buildings, structures and workplaces. This division does not apply to buried piping."

Hazardous substances is defined as, "any substance which is a physical or health hazard."

Physical hazard is defined as "a chemical for which there is scientifically valid evidence that it is a combustible liquid, **a compressed gas**, explosive, flammable, an organic peroxide, or oxidizer, pyrophoric, unstable (reactive) or water-reactive." (emphasis added)

The rule itself states, "Pipes and piping systems which contain hazardous substances or transport substances **in a hazardous state** shall be labelled in accordance with subsections (A), (B), (C) and (D) or otherwise identified in accordance with subsection (c) of this rule:" (emphasis added)

This rule does not exempt compressed air, in fact it specifically identifies compressed gas as a physical hazard. Nor can we find any interpretations that specifically exempt compressed air from the standard. Since Oregon OSHA already identifies compressed air above 30 psi as a specific hazard, and most compressed air piping systems have air at higher pressures, it would be very difficult to argue that pipes with air pressure higher than 30 psi is not air in a hazardous state.

Therefore, we can only conclude that the requirements of 437-002-0378 apply to compressed air.

Please contact Dave McLaughlin at 503-947-7457 if you have any questions.