



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

MAY 22 2007

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

William J. Briner  
1324 Westbend Drive  
Dardenne Prairie, MO 63368

Ref. No.:07-0080

Dear Mr. Briner:

This is in response to your April 9, 2007 letter requesting clarification of the requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-185) applicable to the color of labels. You included six labels, numbered one thru six, with you letter and ask if they meet the color specifications in § 172.407(d). The labels you provided, identified by number, are listed below:

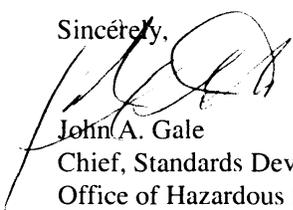
1. FLAMMABLE SOLID label (darker red)
2. FLAMMABLE SOLID label (lighter red)
3. FLAMMABLE LIQUID label (darker red)
4. FLAMMABLE LIQUID label (lighter red)
5. SPONTANEOUSLY COMBUSTIBLE label (lighter red)
6. CARGO AIRCRAFT ONLY (orange)

Based upon a visual examination, a color on a hazard warning label must fall within the color tolerances on the appropriate color chart provided in Appendix A to Part 172 (§ 172.407(d)(4)). In accordance with § 172.407(d)(5), labels conforming to PANTONE® color standards are also acceptable. However, if you choose to use PANTONE® colors, the labels must be an exact match to the color in the PANTONE® formula guide coated/uncoated. For red you may use PANTONE® 186 U and for orange PANTONE® 151 U, as provided in the formula guide.

After reviewing your labels and comparing them to color tolerance charts conforming to Appendix A to Part 172 and the PANTONE® formula guide coated/uncoated, we concluded none of the labels meet the PANTONE® color standards and only labels 1 and 3 fall within acceptable color tolerances. Therefore, it is our opinion that labels 1 and 3 meet the color requirements in § 172.407(d).

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

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



070080

172.407(d)

Supko  
§172.407(d)  
Labeling  
07-0080

William J. Briner  
1324 Westbend Drive  
Dardenne Prairie, MO 63368

April 9, 2007

Mr. Edward Mazzullo, Director  
Office of Hazardous Materials Standards (PHH-10)  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, DC 20590

Re: Request for Interpretation Regarding DOT Label Color Tolerance

Dear Mr. Mazzullo:

I am writing to request review of the enclosed DOT labels for compliance with the 49 CFR 172.407(d) color specifications.

Each label is marked on the back with a number, as follows:

1. FLAMMABLE SOLID label (darker red)
2. FLAMMABLE SOLID label (lighter red)
3. FLAMMABLE LIQUID label (darker red)
4. FLAMMABLE LIQUID label (lighter red)
5. SPONTANEOUSLY COMBUSTIBLE label (lighter red)
6. CARGO AIRCRAFT ONLY (orange)

Thank you in advance for your help.

Sincerely,



William J. Briner