

October 7, 1999

Mr. James R. Winkler
Director of Transportation & Distribution
Chemtech Products, Inc.
1630 Des Peres Road, Suite 210
St. Louis, Missouri 63131

Dear Mr. Winkler:

Ref. No. 99-0094

This is in response to your letter dated April 12, 1999, regarding the Class 8 label specification under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Specifically, you ask whether your Class 8 (corrosive) label, imprinted on a brown bag, is in conformance with the HMR.

Except for size and color, a Class 8 label must conform to the illustration shown in § 172.446 and the specifications contained in § 172.407. The color and the pictorial shown on your label does not meet these requirements..

The background of the Class 8 label is required to be white in the top half and black in the lower half. "White" as defined by the American College Dictionary, is an achromatic color of maximum lightness; as new snow. Alterations to the symbol, such as the speckles shown on the hand depicted on the label, are not authorized. See § 172.407 (b)(1).

I trust this answers your question. Please contact us again if we can be of more assistance.

Sincerely,

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

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