



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

January 19, 2023

Ms. Janice Hayes
Logistics Customer Service Manager
Coty Riverside Distribution Center
4608 Appliance Drive
Belcamp, MD 21017

Reference No. 22-0072

Dear Ms. Hayes:

This letter is in response to your June 28, 2022, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to labeling shipments of limited quantities. In your letter, you provided pictures of a limited quantity package that has the limited quantity marking reproduced on multiple sides of the package. You note that in some instances, one of the limited quantity markings may be covered by a shipping label; however, the remaining limited quantity markings remain visible on the package. You ask whether this situation is permissible, i.e., to possibly cover up one of the limited quantity markings on the package, provided at least one other limited quantity marking is visible on the package.

Based on the description and photographs provided in your letter, the answer is yes. Section 172.315(a)(2) states that the limited quantity square-on-point marking “must be durable, legible, and of a size relative to the packaging, readily visible, and must be applied on at least one side or one end of the outer packaging.” The HMR do not prohibit the placing of multiple limited quantity markings on a package, such as depicted in your photographs, provided the applicable requirements in § 172.315 are met. However, it is the opinion of this Office that a partially-obscured limited quantity marking—as pictured in your incoming letter—should be covered to avoid frustration of your shipment during transportation.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster".

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: COTY Correspondence
Date: Friday, July 22, 2022 1:51:54 PM
Attachments: [EO - Approv\(COTY\) 12Jul22.pdf](#)
[image002.png](#)
[image004.png](#)

Hi Alice,

Please see the attached LOI request.

Let me know if you need anything from us.

Regards,

-Breanna

From: Nicks, Michael (PHMSA) <michael.nicks@dot.gov>
Sent: Tuesday, July 12, 2022 11:06 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: FW: COTY Correspondence

FYA.

Michael Nicks

Transportation Specialist, Office of Hazardous Materials Safety

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave., Washington D.C. 20590
Office: 202-366-5610

[PHMSA Home](#) | [LinkedIn](#) | [Twitter](#) | [HAZMAT](#) | [OPS](#)



From: Approvals (PHMSA) <Approvals@dot.gov>
Sent: Tuesday, July 12, 2022 11:02 AM
To: Nicks, Michael (PHMSA) <michael.nicks@dot.gov>
Subject: FW: COTY Correspondence

Duane M. Cassidy

Chief, Pressure Vessels Branch (PHH-25)

Sciences and Engineering Division
Office of Hazardous Materials Safety

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Know what's below.
Call before you dig.



From: Lisak, Frank (PHMSA) <frank.lisak@dot.gov>
Sent: Tuesday, July 12, 2022 10:32 AM
To: Approvals (PHMSA) <Approvals@dot.gov>
Subject: COTY Correspondence

Good Morning, Gentlemen:

The attachment is for your review.

Frank