



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JUN 11 1998

Mr. Carl M. Larson
Van Waters & Rogers Inc.
Post Office Box 34325
Seattle, WA 98124

Mr. Larson:

This is in response to your letter dated February 3, 1998, requesting review of Van Waters & Rogers Inc.'s identification number marking printed onto vinyl label stock and placed on placards (sample placard enclosed). You asked if the enclosed sample meets the requirements in 49 CFR 172.332(c)(1).

Based on this Office's examination of the sample placard, the numerals used in the identification number marking display are not the correct size; the number "1" is 86 mm and the numbers "993" are 91 mm. As specified in 49 CFR 172.332(c)(1), the size of the numerals of the identification number displayed on a placard must be 88 mm (3.5 inches) in black Alpine Gothic or Alternate Gothic No. 3 on a white background 100 mm (3.9 inches) high and approximately 215 mm (8.5 inches) wide.

The placard and identification number marking display must be strong and durable and conform to the requirements in 49 CFR 172.519(a)(1) and (2); thus, the scotch tape used on the sample placard to hold the vinyl label in place may not meet the durability requirement. Also, black and any color on a placard must be able to withstand, without substantial change a 72-hour fadeometer test and a 30-day exposure to open weather conditions (see 49 CFR 172.519(d)). In order to keep down confusion, although the requirements in 49 CFR 172.332(c)(1) do not prescribe a certain type or category of "white," you may wish to increase the size of the vinyl label stock to the size of the white center area of the sample placard to cover what appears to be differences in color.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



Van Waters & Rogers Inc.

A ROYAL PAKHOED COMPANY

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Seattle, WA 98124
(425) 889-3435
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Englum
File: 172.332(c)(1)
SC: 234, 230

February 3, 1998

Mr. Edward T. Mazzullo
Director
Office of Hazardous Materials Standards
Research and Special Programs Administration
U.S. Department of Transportation
400 7th Street SW
Washington, DC 20590-001

Dear Mr. Mazzullo,

Recently Van Waters & Rogers Inc. purchased a new label making system. This system allows our offices to print various labels on site, on demand. One of the uses we have found for this system is to print the four digit UN identification number for placards onto vinyl label stock and then stick the vinyl label onto the placard.

49 CFR 172.332(c)(1) outlines the specifications for the height of the numbers. Because of restrictions in the size of the vinyl label stock the proposed placard identification number label would be 6 3/8" wide. Before I put this new label process into production I would like your approval of the identification number size.

I have included a sample placard with the identification number printed on plain paper, but the size is identical to what would be printed on vinyl label stock.

Sincerely,
Van Waters & Rogers, Inc.

Carl M. Larson
Manager - Product Information