



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

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

FEB 12 2001

Ref. No. 00-0273

Mr. Eddie Deveaux  
Dangerous Goods of America  
P.O. Box 590888  
Miami, FL 33159

Dear Mr. Deveaux:

This is in response to your letter and subsequent telephone conversation with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) with regard to the requirements for the proper orientation of labels on packagings containing hazardous materials. Your understanding of the terms, "diamond (square-on-point)" in the HMR and "set at an angle of 45°" in the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air, is that they do not have the same meaning.

The terms "a 45 degree angle" and "diamond (square-on-point)" are synonymous and refer to the orientation of the label design for the placement of the pictorial symbol, text, class or division number and compatibility group. Section 172.406 addresses the placement of labels on packages. The HMR do not prohibit the placement of hazard warning labels in an orientation where the square-on-point is located with its flat sides parallel to the sides of the packages. The labels may be placed square-on-side when square-on-point is not practicable.

I hope this information is helpful. Please contact us if you have additional questions.

Sincerely,

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



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MCIntyre  
172.407  
Labeling  
00-0273

September 26, 2000

US Department of Transportation  
RSPA (DHM-10)  
400 Seventh St. S.W.  
Washington, D.C. 20590  
Mr. Jeffrey Furr.

Dear Mr. Furr:

I would greatly appreciate it if you could clarify the proper placement, affixation, and orientation of labels on packages containing hazardous material being shipped domestically and internationally via air transport. According to 49 CFR 172.406 the requirements do not prohibit the placement of labels at square on point; however the illustration used in 49 CFR 172.411 thru 172.446, clearly shows the labels set at 45 degree angle (on diamond point).

According to ICAO 3.4.1.1. it clearly states class hazard labels **MUST** conform to the following specifications:

- ❖ They must be in the form of a square with minimum dimensions of 100mm x 100mm, "set at an angle of 45 degree (diamond shape)".

Furthermore, IATA 7.2.2.2 (types of labels) also clearly states that a hazard label in shape of a square set at 45 degree angle which are required for most dangerous goods in all classes.

Based on IATA and ICAO regulations please inform me as to which appropriate authority IATA/ICAO, or DOT(49CFR), takes precedence in regards to domestic and/or international shipment containing hazardous material via air transport in reference to proper placement, affixation, and orientation.

Awaiting your reply,  
Sincerely,

A handwritten signature in cursive script, appearing to read "Eddie Deveaux".

Eddie Deveaux  
Consultant