



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

SEP 24 2002

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

Mr. Paul Reamy  
504 Misty Lane  
North Fort Myers, FL 33903

Reference No. 02-0207

Dear Mr. Reamy:

This is in response to your July 30, 2002 letter asking if hazard warning labels are required to be positioned in a square-on-point (diamond) configuration under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and the International Civil Aviation Organizations Technical Instructions on the Transport of Dangerous Goods (ICAO Technical Instructions).

The answer is no. While it is the intent of these regulations that a label be oriented square-on-point on a package when possible, the requirements in 49 CFR 172.406 and Sections 3.2 and 3.4 of the ICAO Technical Instructions 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 package.

I hope this satisfies your request.

Sincerely,

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



020207

172.406

Edmonson  
§ 172.406  
Labeling  
02-0207

July 30, 2002

Mr. Edward T. Mazullo, Director  
Office of Hazardous Materials Standards, DHM 10  
Research and Special Programs Administration  
400 7 th Street S.W.  
Washington, DC, 20590

Dear Ed;

It is my understanding that the current labeling requirements in 49 CFR Subpart E of the Hazardous Materials Regulations do not require that hazard labels be applied so as to point on point. That is, hazard labels may be applied square on square. Am I correct in my interpretation?

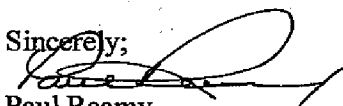
Would the same be true of the labeling requirements of the International Civil Aviation Organizations Technical Instructions(ICA0)?

Section 3.4.1.1 in the ICAO states in part " Class labels must conform to the following SPECIFICATIONS: They must be in the form of a square with minimum dimensions of 100mm, set at an angle of 45 degrees (diamond shaped) except that labels of 50mmx50mm may be used on packages containing infectious substances where the packages are of dimensions such that they can only bear smaller labels".

Does RSPA interpret this verbiage in ICAO to mean that hazard labels must be applied point to point ?

Thanks so much for your time and the time of your staff in considering these questions. An early response would be appreciated.

Sincerely;

  
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