



U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**

DEC - 2 2010

1200 New Jersey Ave, SE  
Washington, D.C. 20590

Mr. Jerry Loza  
Quality Coordinator  
Serenity Packaging Corporation  
1601 East Main Street, Suite 2E  
St. Charles, IL 60174

Reference No. 10-0168

Dear Mr. Loza:

This is in response to your e-mail asking for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requirements for labels. You submitted an example of a corrosive label that appears to be printed directly on the surface of a package. You ask whether the depicted label meets the HMR labeling requirements regarding the white and black colors.

The answer is no. Section 172.442(b) specifies that in addition to complying with the label specification requirements found in § 172.407, the background of the corrosive label must be white in the top half and black in the lower half. The colors in the pictorial you submitted do not meet these requirements. "White," as defined by the American College Dictionary, is an achromatic color of maximum lightness; as new snow. The variations in the black coloring in the lower half of your example also are not authorized. "Black," as defined by the American College Dictionary, is an achromatic color value of minimum lightness or maximum darkness; darkest hue.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

A handwritten signature in black ink that reads "T. Glenn Foster". The signature is fluid and cursive, with a horizontal line extending from the end.

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

**Drakeford, Carolyn (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Monday, August 02, 2010 1:35 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Interpretation 2  
**Attachments:** worse case of print.JPG

McIntyre  
\$173.241

\$172.442

\$172.101

Labeling

10-0168

Hi Carolyn,

Jerry Loza is requesting an official letter of interpretation. Previously, he spoke with HMIC staff and was referred to letters 07-0146 and 01-0029.

Thanks,

Victoria Lehman  
Hazmat Information Center  
202-366-1035

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**From:** Jerry Loza [mailto:jerry.loza@serenitypkg.com]  
**Sent:** Monday, August 02, 2010 11:08 AM  
**To:** INFOCNTR (PHMSA)  
**Subject:** Interpretation 2

We would like an official interpretation to determine if this print meets the D.O.T. guidelines. I did not find Pantone guidelines for black or white print. Please call if there are any questions.

*Jerry Loza*

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Quality Coordinator  
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Sodium Hydroxide, Solution  
UN1824





Sodium Hydroxide, Solution,  
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