

October 5, 1999

Mr. Richard Eggleston  
Environmental Engineering HRVE  
International Business Machines (IBM)  
1701 North Street  
Endicott, New York 13760

Ref. No. 99-0146

Dear Mr. Eggleston:

This is in response to your letter dated June 1, 1999, regarding the Class 9 label specification under the Hazardous Materials Regulations (HMR;49 CFR Parts 171-180). Specifically, you inquired whether the color "white", as depicted on your Class 9 label imprinted on a black poly bag is in conformance with the color tolerances of the HMR.

The color of your Class 9 label does not satisfy the requirements of §§ 172.407 and 172.446 of the HMR. The background of the Class 9 label is required to be white. "White" as defined by the American College Dictionary is an achromatic color of maximum lightness; as new snow.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

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

172.407