



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAR 30 2000

Mr. Robert A. Maberry III
Chemical Transportation Administrator
Yellow Freight System, Inc.
P.O. Box 7270
Overland Park, KS 66207

Ref. No. 00-0083

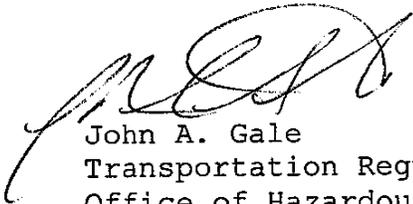
Dear Mr. Maberry:

This is in response to your letter dated March 21, 2000,
regarding the removal of placards required under the Hazardous
Materials Regulations (HMR; 49 CFR parts 171-180).
Specifically, you ask whether you may use a heat gun to remove
placards from a transport vehicle.

The answer is yes. The use of a heat gun (i.e., a device that
does not use a flame or produce sparks) may be used to remove
placards from a transport vehicle.

I hope this satisfies your request.

Sincerely,



John A. Gale
Transportation Regulatory Specialist
Office of Hazardous Materials Standards



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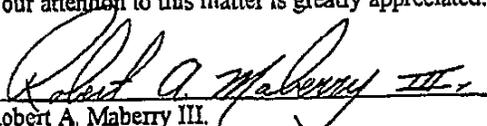
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Mr. Edward Mazullo

I am seeking an interpretation and clarification of CFR 49, 177.854 (g). During the winter months, adhesive backed placards are extremely hard to remove from a trailer. Placards are frequently changed to reflect the current hazardous materials loaded on the trailer. My question is this, can we use a heat gun to heat the placards on the outside of a van trailer to remove it from the trailer. The heat gun, much like a hair dryer does not use a flame or produce sparks and removing a placard is not repairing or maintaining the cargo or fuel containment system of a motor vehicle. Am I in compliance with CFR 49 in using a heat gun to remove placards from a trailer that contains hazardous materials? Is there another area in CFR 49 that better addresses this situation?

Your attention to this matter is greatly appreciated.


Robert A. Maberry III,
Chemical Transportation Administrator
Yellow Freight System, Inc.

