



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

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

DEC 23 2002

Mr. Robin J. Eddy  
Safety and Regulatory Compliance Manager  
Allied Universal Corp.  
3901 NW 115<sup>th</sup> Avenue  
Miami, Florida 33178

Ref No. 02-0056

Dear Mr. Eddy:

This responds to your letter concerning our previous interpretation dated October 11, 2001 to the Chlorine Institute regarding the requirements for placarding materials poisonous by inhalation under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You asked for further clarification of the requirements applicable to dual placarding of Chlorine and Sulfur dioxide rail cars shipped to the United States from Canada or Mexico. We apologize for the delay in responding and hope it has not caused any inconvenience. Your questions are paraphrased and answered as follows:

- Q1. Your company receives rail cars from Canada containing "Chlorine" classed as a Division 2.3 (Poison gas). The Canadian rail car displays the international "TOXIC GAS" placard with the identification number "UN 1017" displayed across the middle, and the United States' "POISON GAS" placard is displayed containing the words "INHALATION HAZARD." You asked, should the United States' "POISON GAS" placard display the identification number "UN 1017" instead of the text "INHALATION HAZARD" on the placard.
- A1. A Canadian rail car containing Chlorine transported to the United States from Canada must be placarded with the POISON GAS placard specified in § 172.504(e), Table 1, and as shown in § 172.540. Except for a RADIOACTIVE or DANGEROUS placard, text indicating a hazard, such as "INHALATION HAZARD", is not required on a placard (see § 172.519(b)(3)). The rail car must be marked "Inhalation Hazard" on two opposing sides of a bulk packaging as specified in § 172.313(a). When the words "INHALATION HAZARD" appear on the placard, the marking is not required on the package.

The identification number "UN 1017" must be marked on each side and each end of a rail car as prescribed in §172.330. In accordance with § 172.332, an identification number may be displayed on a placard, orange panel, or white square-on-point configuration. Display of the Canadian "TOXIC GAS" placard is not prohibited, and may be used to display the identification number "UN 1017" for Chlorine.



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- Q2. Rail car shipments of "Sulfur dioxide" from Mexico only display the international "TOXIC GAS" placard. May rail car shipments of Sulfur dioxide from Mexico display dual placards?
- A2. In accordance with § 171.12(e), hazardous materials shipments from Mexico to the United States or from the United States to Mexico must conform to all of the applicable requirements of the HMR. When a rail car contains a material poisonous by inhalation, such as Sulfur dioxide, transported from Mexico to the United States, the rail car must be placarded with the "POISON GAS" placard as shown in § 172.540. Display of the international "TOXIC GAS" placard is not prohibited, as specified in § 172.502(b).

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,



Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



**ALLIED UNIVERSAL CORP.**, 3901 NW 115<sup>th</sup> Avenue, Miami, Florida 33178

305-888-2623

January 26, 2002

**VIA CERTIFIED MAIL**

Mr. Robert McGuire  
Associate Administrator for Hazardous Material Safety  
Office of Hazardous Materials Exemptions and Approvals (DHM-32)  
Research and Special Programs Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590-0001

02-0056

DO/RS/PA/OHMS  
EXEMPTIONS & APPROVALS  
FEB 19 PM 5:04

Engrum  
§ 172.505  
Placarding

Re: Poison-Gas Placards for Chlorine and Sulfur Dioxide Railcars shipping from Canada and Mexico

Dear Mr. Associate Administrator:

I have read your October 11, 2001 interpretation letter to Dr. Robert Smerko of the Chlorine Institute regarding the dual placarding of Chlorine railcars. Your letter has caused a request for further interpretation of the following:

- 1) On the chlorine railcars from Canada, we are currently receiving cars with the Hazard Class 2.3 Toxic Gas placard with the UN number 1017 displayed across the middle and the Hazard Class 2.3 new Inhalation Hazard placard with the words "Inhalation Hazard" displayed across the middle. For the United States' required placard, should not the railcar display the appropriate UN number and not the Inhalation Hazard wording? After all, this is a railcar shipment and the US does not recognize the Toxic Gas placard where the UN number is being displayed.
- 2) What about railcars containing Hazard Class 2.3 material from Mexico? May they also display dual placards? For example, a Sulfur Dioxide railcar from Mexico was cited by a FRA Enforcement Officer, Nancy Hunter, in our Ranger, Georgia facility for not displaying the correct placards. It displayed the Toxic Gas Hazard Class 2.3 placard and not the new US Inhalation Hazard Class 2.3 placard. The railcar was shipped from Mexico and correctly placarded per international law, but not US. May we instruct our supplier to dual placard the Sulfur Dioxide cars too?

If you should have any questions, please call me at 800-981-6700, extension 183.

Sincerely,

Robbin J. Eddy  
Safety and Regulatory Compliance Manager  
Allied Universal Corporation