



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

JUN 13 2005

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

Sergeant David Feather
Safety Division, Motor Carrier Safety
Commonwealth of Virginia
Department of State Police
P.O. Box 10900
Fairfax Station, VA 22039-0900

Ref. No. 05-0108

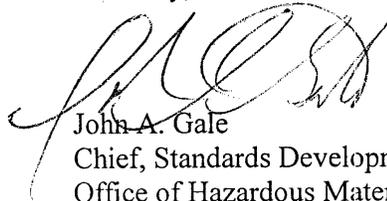
Dear Sergeant Feather:

This is in response to your April 25, 2005, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the same placard must be displayed on each side and each end of a transport vehicle. You describe a situation in which a vehicle transports 600 lbs of a Division 2.1 (flammable gas), 600 lbs of a Division 2.2 (non-flammable compressed gas) and 600 lbs of oxygen. The vehicle is placarded on two sides with a DANGEROUS placard and on the two ends with a Division 2.1 placard.

A freight container, unit load device, transport vehicle, or rail car which contains non-bulk packages with two or more categories of hazardous materials that require different placards specified in table 2 of § 172.504(e) may be placarded with a DANGEROUS placard instead of the separate placarding specified for each of the materials in table 2. Each side and each end of a freight container, unit load device, transport vehicle or rail car must have identical placards in design and quantity. Thus, for the situation you describe, a carrier may not satisfy the placarding requirements by affixing a DANGEROUS placard on each side and affixing a Division 2.1 placard on each end of a transport vehicle.

I hope this satisfies your request.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



050108

172.504



BAH
172.504.
Placarding
05-0108

Colonel W. Steven Flaherty
Superintendent

(804) 674-2000

COMMONWEALTH OF VIRGINIA

DEPARTMENT OF STATE POLICE

P. O. Box 10900
Fairfax Station, Virginia 22039-0900

April 25, 2005

Mr. John A. Gale
Chief, Standards Development
Office of Hazardous Material Standards
Pipeline and Hazardous Materials
Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Dear Mr. Gale:

I am respectfully requesting an interpretation concerning placarding. A question has been raised in the enforcement community concerning this matter.

The situation involves the use of the "Dangerous" placard.

If a vehicle were transporting the combination of the following Table 2 materials:

600 pounds of a 2.1 Material
600 pounds of a 2.2 Material
600 pounds of Oxygen

Would the use of a 2.1 placard displayed on the front and rear of a transport vehicle and a dangerous placard displayed on two sides of the same transport vehicle be in compliance with 172.504(a) & (b) and 172.504(f)(3)?

§172.504 General placarding requirements, reads as follows:

(a) General. Except as otherwise provided in this subchapter, each bulk packaging, freight container, unit load device, transport vehicle or rail car containing any quantity of a hazardous material must be placarded on each side and each end with the type of placards specified in Table 1 and 2 of this section and in accordance with other placarding requirements of this subpart, including the specifications for the placards named in the tables and described in detail in §172.519 through §172.558.

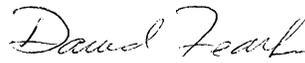
(b) DANGEROUS placard. A freight container, unit load device, transport vehicle, or rail car which contains non-bulk packages with two or more categories of hazardous materials that require different placards specified in Table 2 of paragraph (e) of this section may be placarded with a DANGEROUS placard instead of the separate placarding specified for each of the materials in Table 2 of paragraph (e) of this section. However, when 1,000 kg (2,205 pounds) aggregate gross weight or more of one category of material is loaded therein at one loading facility on a freight container, unit load device, transport vehicle, or rail car, the placard specified in Table 2 of paragraph (e) of this section for that category must be applied.

(f)(3) A NON-FLAMMABLE GAS placard is not required on a transport vehicle which contains non-flammable gas if the transport vehicle also contains flammable gas or oxygen and it is placarded with FLAMMABLE GAS or OXYGEN placards, as required.

The regulations do not clearly state that the transport vehicle must display the same placard on each side and each end, whether it would be a 2.1 Flammable Gas, or Dangerous. In reading the regulations, some believe that either placard would be in compliance. Section 172.504(a) requires the specified placard for the Table 1 or the Table 2 material; while section 172.504(b) permits the use of the use of the Dangerous placard instead of the specified placarding for each of the materials specified in Table 2. However, neither section requires that the same placard be displayed on each side and each end.

Your assistance in this matter would be greatly appreciated.

Sincerely,

A handwritten signature in cursive script that reads "David Feather".

David Feather, Sergeant

Virginia Department of State Police Safety
Division, Motor Carrier Safety