



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

JUL 20 2005

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

Mr. Tom Beckman
Chemical Products Manager
Laidlaw Corporation
5326 Industrial Park Road
Metropolis, Illinois 62960

Ref. No. 05-0157

Dear Mr. Beckman:

This responds to your June 16, 2005 letter requesting clarification on placarding under § 172.500(b)(6) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask how to placard a mixed load of non-bulk packagings containing combustible liquids, corrosive liquids, and Packing Group III, Division 6.1 poisonous materials.

According to your letter you were cited for not having the COMBUSTIBLE placard on your vehicle. Your vehicle was placarded as follows:

CORROSIVE placard for 2,835 pounds of corrosive liquids (in non-bulk packagings)
DANGEROUS placard for 5,000 pounds but less than 6,000 pounds of combustible liquids (in non-bulk packagings) and less than 1,000 pounds of Packing Group III, Division 6.1 poisonous materials (in non-bulk packagings)

In accordance with § 172.500(b)(6), combustible liquids in non-bulk packagings are not required to be placarded. Section 172.504 authorizes the use of the DANGEROUS placard for two or more Table 2 hazardous materials in lieu of the specific placard for each hazard class until 1,000 kg (2,205 pounds) aggregate gross weight or more of one category of material is loaded at one loading facility. At that threshold, the transport vehicle must be placarded for that category of material as specified in Table 2 of § 172.504(e). For the materials described in your letter in the quantities indicated, the CORROSIVE placard and the DANGEROUS placard satisfy the requirements of the HMR.



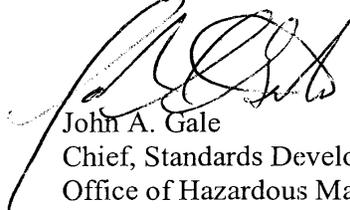
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172.500 (b)(6)

For your information, the exceptions in § 172.504(c) do not prohibit the display of placards according to this subpart, if not otherwise prohibited, on transport vehicles or freight containers that are not required to be placarded [see § 172.502].

I hope this answers your inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Gale", written over the printed name.

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



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§ 172.500(b)(6)
Placarding
05-0157

June 16, 2005

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/PHMSA (PHH-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

Dear Sir,

I would like to have an interpretation concerning a placarding question.

Based on 49CFR 172.500(b)(6) which states that combustible liquids in non-bulk packaging do not need to comply with the placarding requirements, we placarded a load in the following manner:

The load contained:

Greater than 5000 pounds but less than 6000 pounds of combustible liquid in non-bulk packaging.

2835 pounds of Class 8 Corrosive Liquids (in non-bulk packaging)

Less than 1000 pounds of Class 6.1 PG III Liquids (in non-bulk packaging)

The load was placarded with the Corrosive placard for >2205 pounds of Class 8, and Dangerous to cover the Combustible Liquid in non-bulk packaging and the small amount of Class 6.1 PG III material, since they were part of a mixed load.

Our driver was cited because he was told the load should have been placarded with the Corrosive and Combustible placard.

What is the correct way?

I will be looking forward to the interpretation of 49CFR 172.500(b)(6).

Sincerely,

Tom Beckman/Laidlaw Corporation
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