



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

MAY -3 2006

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

Mr. Kurt Colburn  
Director of Technical Services  
MHF Logistical Solutions  
800 Cranberry Woods Drive, Suite 450  
Cranberry Township, PA 16066

Ref. No. 05-0311

Dear Mr.Colburn:

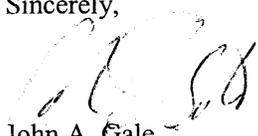
This is in response to your December 5, 2005 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you request clarification regarding placarding requirements for multiple bulk packages on a single transport vehicle.

Except as otherwise provided in the HMR, each bulk packaging, freight container, unit load device, transport vehicle or railcar containing any quantity of a hazardous material must be placarded on each side and each end with the types of placards specified in Subpart F of Part 172.

The requirement to placard the motor vehicle may be met by the placards displayed on freight containers or portable tanks (§ 172.516). However, except as provided in § 172.336, a placard bearing an identification number may not be used to meet the requirements of Subpart F of Part 172 unless it is the correct identification number for all of the hazardous materials of the same class in the transport vehicle or freight container on which it is displayed.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

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



050311

172.504  
172.508



Leary  
§172.504  
§172.508  
Placarding  
05-0311

800 Cranberry Woods Drive, Suite 450, Cranberry Township, PA 16066 T 724.772.9800 F 724.772.9850 W [www.mhifs.com](http://www.mhifs.com)

Mr. Edward Mazzullo  
Director of Hazmat Standards  
USDOT/PHMSA, Suite 8422  
Office of Hazardous Materials Safety  
400 7<sup>th</sup> Street, SW  
Washington, DC 20590-3012

December 5, 2005

SUBJECT: Clarification of Placarding Requirements for Cargo Containers on Railcars

Dear Mr. Mazzullo,

This letter requests clarification of the placarding requirements for cargo containers (and bulk intermodal containers) shipped by rail.

Regulation 49 CFR 172.508(a) states that when placards are required, they must be affixed to all four sides of the rail car, and that this requirement may be met by placards placed on the packages.

In addition, 49 CFR 173.504(a) states that placards are required for bulk packages, freight containers, or rail cars.

1. Clarification is requested for the case of multiple bulk packages on a single rail car. Specifically, please confirm that it is acceptable to distribute placement of the 4 placards required for the rail car over the bulk packages placed on the rail car. In this arrangement, a single placard would appear on the sides, front, and rear of the *rail car*. However, the individual *packages* might be placarded on only one side (or not at all).
2. Similarly, if two bulk packages are shipped by truck, please confirm it is permissible to distribute the 4 required placards among the two packages so that the 4 sides of the truck are placarded as required.

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3. An alternative interpretation of 172.508(a) is that cargo containers must be placarded on all four sides, even when transported in groups of two or more on a single conveyance. In this arrangement, the front and rear placards of adjoining containers are not readily visible, and placards on the sides of the individual containers amount to redundant placarding of the conveyance. Please confirm that such redundant placarding is *permissible, but not required*.

Your consideration of this request is appreciated. Please feel free to call me at (724) 772-9800, ext. 5560 if you have any questions about this letter, or require any additional information to consider this request.

Respectfully submitted,

MHF Logistical Solutions

A handwritten signature in black ink, appearing to read 'Kurt Colborn', written in a cursive style.

Kurt Colborn  
Director of Technical Services