



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

SEP 30 1998

Mr. Samuel V. Yardumian  
JEVIC Transportation Inc.  
P.O. Box 5157  
Delanco, NJ 08075

Ref. No. 98-0263

*Dear Mr. Yardumian:*

This is in response to your letter dated ~~September~~ September 1, 1998, regarding clarification of the requirements in 49 CFR 172.301(a)(3) for identification number markings on transport vehicles containing large quantities of hazardous materials in non-bulk packagings under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

You provided the following scenarios and questions:

- Q1. Vehicle contains 2,500 kg of "Paint, 3, UN 1263, PG II" in non-bulk containers loaded at one location. A FLAMMABLE placard is applied to the vehicle. At the next stop, loaded 2,500 kg of "Paint, 3 UN 1263, PG II" on the same vehicle. Is it necessary to mark the vehicle with the "1263" identification number?
- A1: No. Display of the identification number markings on each transport vehicle or freight container is only required when: 1) each non-bulk package is marked with the same proper shipping name and identification number; 2) the aggregate gross weight of the hazardous material is 4,000 kg (8,820 lbs.) or more; 3) all of the hazardous material is loaded at one loading facility; and 4) the transport vehicle or freight container contains no other material, hazardous or non-hazardous [Docket HM-206; Final rule; 62 FR1217; 01/08/97; corrections and editorial changes; 62 FR 39398; 07/22/97; and 62 FR 16070; 04/ 01/98].
- Q2. Vehicle contains 2,500 kg of "Printing ink, 3, UN 1210, PG II" in non-bulk containers. At another location, 5,000 kg of "Paint, 3, UN 1263, PG II" in non-bulk containers is loaded on the same vehicle. Is only the FLAMMABLE placard required, or is the "1263" identification number marking also required to be displayed?
- A2. Only the FLAMMABLE placard is required.
- Q3. Vehicle contains some non-hazardous freight. At another location, the vehicle is loaded with 5,000 kg of "Paint, 3, UN 1263, PG II" in non-bulk containers. In addition to the FLAMMABLE placard, is it necessary to mark the vehicle with the "1263" identification number?

A3. No. See "Answer 1" above.

Q4. Vehicle contains 5,000 kg of "Paint, 3, UN 1263, PG II" in non-bulk containers loaded at one location. The FLAMMABLE placard, marked with the identification number, is applied to the vehicle. At the next stop, 5000 kg of "Printing ink 3, UN 1210, PG II" is loaded on the same vehicle. May an unmarked FLAMMABLE placard be used for the entire load?

A4. Yes.

I hope this satisfies your inquiry.

Sincerely,



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

# JEVIC

## TRANSPORTATION INC.

98-0263

600 Creek Road, PO Box 5157 Delanco, NJ 08075

Engrum  
§ 172.301

Mr. Delmer Billings, Chief, Standards Development  
Office of Hazardous Materials Standards  
U.S. Department of Transportation  
Room 8102  
400 Seventh St., SW  
Washington DC 20590

September 1, 1998

Dear Mr. Billings:

Jevic Transportation, Inc. is in the process of reviewing new Hazardous Materials training materials it has developed for its drivers and support personnel. In order to ensure clarity of the training, examples of placarding under the current regulations are given using hypothetical but not atypical scenarios. Unfortunately, a few of the scenarios are causing some question of accuracy among ourselves. For that reason, we desire to submit several of them to you for your consideration and opinion.

Scenario 1 Begin with a vehicle containing 2,500 kg. of "Paint, 3, UN 1263, PG II" in non-bulk containers loaded at one location. The FLAMMABLE placard, is applied to the vehicle. At the next stop an additional 2,500 kg. of "Paint, 3, UN 1263, PG II" in non-bulk containers is loaded into the same vehicle. Is it now necessary mark the vehicle with the "1263" marking? *NO*

Scenario 2 Begin with a vehicle containing 2,500 kg. of "Printing ink, 3, UN 1210, PG II" in non-bulk containers. At another location 5,000 kg. of "Paint; 3, UN 1263, PG II" in non-bulk containers is added. Will the FLAMMABLE placard alone suffice, or is the "1263" marking now required?

*yes; N&ID  
No. marking  
Req.*

Scenario 3 Beginning with a vehicle containing some non-hazardous freight, a stop is made at which 5,000 kg. of "Paint, 3, UN 1263, PG II" in non-bulk containers is loaded. In addition to the FLAMMABLE placard, is it now necessary mark the vehicle with the "1263" marking? *NO.*

Scenario 4 Begin with a vehicle containing 5,000 kg. of "Paint, 3, UN 1263, PG II" in non-bulk containers loaded at one location. The FLAMMABLE placard, marked with the I.D. number 1263 is applied to the vehicle. At the next stop, 5,000 kg. of "Printing ink, 3, UN 1210, PG II," also non-bulk, is added to the load. May an unmarked FLAMMABLE placard now be used to cover the entire load? If not, what placards/markings would be required? What, if any, alternatives might be permissible? *yes.*

We thank you in advance for your consideration of these questions and appreciate any clarification or comment you may offer on them.

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel V. Yardumian', written over a horizontal line.

Samuel V. Yardumian  
Hazardous Materials Specialist

(800) 257-0427  
(609) 461-7111

Ext. 6230

My interpretation of this rule is that option "2" would apply, since there is more than a single hazardous product on board. Furthermore, my understanding of the 4000 kg(8820 lbs) ruling applies only when that is the only product on the truck and total weight, in non-bulk packages exceeds 4000 kg. Your clarification would be greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Walker", written over a horizontal dashed line.

Kevin Walker  
Plant Manager