



U.S. Department
of Transportation

Research and
Special Programs
Administration

MAR - 4 1998

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

Ms. Marilyn Dunn
BMD Enterprises, Inc.
4959 East Dakota
Fresno, California 93727

Dear Ms. Dunn:

This is in response to your letter regarding the placarding requirements for vehicles transporting Chlorine gas under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180), in accordance with the requirements adopted under Dockets HM-181, and HM-206. I apologize for the delay in responding and hope it has not caused any inconvenience.

You asked for clarification of the appropriate placarding requirements for vehicles carrying up to fifteen 20-pound cylinders of chlorine gas, and whether your understanding is correct that any one of the five placarding options are acceptable. You provided the following options:

1. POISON GAS placard with "poison gas" text across center
2. POISON GAS placard with "1017" across center
3. POISON GAS placard with "chlorine" across center, for highway and rail
4. POISON GAS placard with "inhalation hazard" across center (as adopted in HM-206)
5. POISON GAS placard with "1017" across the center (as adopted under HM-206)

Option "3" is not acceptable. The other options may be used. The effective date for transitional placarding provisions for materials poisonous by inhalation (e.g., Chlorine) expired. [HM-181; 56 FR 47158; 9/18/91] Therefore, since the CHLORINE placard was obsolete as of October 1, 1992, it may no longer be used. In a subsequent final rule, for highway transportation only, until October 1, 2001, placards which conform to specifications for placards in effect (1) on September 30, 1991, or (2) placards specified in the December 21, 1990 final rule may be used, in place of the placards specified in Subpart F of Part 172, in accordance with the "Placard Substitution Table" (PST) in § 171.14. [HM-181; 57 FR 45446; 10/1/92] The CHLORINE placard is not shown in the "PST" as an option for placarding Chlorine gas.

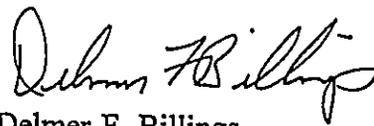
A final rule was published in the **Federal Register** which adopted new placards for materials poisonous by inhalation (PIH). Therefore, until October 1, 2001, for PIH materials, by all modes of transportation, placards may be used that conform to specifications for placards (1) in effect on September 30, 1991, (2) specified in the December 21, 1990 final rule, or (3) specified in the July 22, 1997 final rule, in accordance with the "PST" in § 171.14. [HM-206; 62 FR 1217; 01/08/97 and corrections and responses to petitions for reconsideration, 62 FR 39398; 07/22/97]

You also asked if your understanding is correct that a subsidiary Class "8" (CORROSIVE) placard is not required for chlorine, even though it is classified as having a subsidiary hazard class of "8" under the HMR.

Your understanding is correct. Only the POISON GAS (old or new) placard is required to be displayed.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,



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

cc: Doug Ham, FAX No. 703-241-0539



ENTERPRISES, INC.

4959 EAST DAKOTA • FRESNO, CALIFORNIA 93727 • PHONE (209) 291-7708

Engram
File 172.500
SC 300, 270

May 15, 1997

Edward T. Mazzullo, Director
Office of Hazardous Materials Standards
Research & Special Programs Administration
U. S. Department of Transportation
DHM-10, Room 8102
400 7th Street, SW
Washington, DC 20590

Dear Mr. Mazullo:

With the addition of acceptable alternatives for placarding of chlorine gas under HM-206, I am writing to obtain clarification of appropriate placarding for our small motor vehicles carrying up to fifteen of the 20-pound cylinders of chlorine gas. It is my understanding that any one of five of the following placards may be acceptable. (I have attached a rough sketch of the five)

1. As permitted under HM-181 and HM-206 through October 1, 2001, a placard with "poison gas" in the center, with a skull and crossbones at the top, and a "2" at the base.
2. Also, through 2001, a placard with "1017" in the center, with a skull and crossbones at the top, and a "2" at the base.
3. As permitted under HM-181 for highway transportation only and for transitional purposes through October 1, 2001, a placard with "chlorine" in the center, with a skull and crossbones at the top, and a "2" at the base.
4. As now permitted under HM-206, a placard with "inhalation hazard" in the center, with a skull and crossbones at the top in a diamond configuration, with a "2" at the base, and
5. As also permitted under HM-206, a placard with "1017" in the center, with skull and crossbones at the top in a diamond configuration, with a "2" at the base.

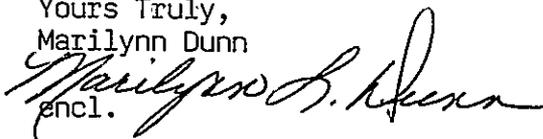
Please let me know if my understanding of the placarding for chlorine gas is correct and, if possible, cite the code numbers for them. If my understanding is incorrect, what are the correct placards. Also, is it possible that there are additional placards other than those mentioned that are acceptable?

Also, chlorine gas has been assigned a subsidiary hazard class of 8. My understanding of the code indicates that a subsidiary hazard placard is not required (although a label on the cylinder is.) Is this correct?

Currently, we are using DOT Chart 10 for guidance on hazardous marking, labeling and placarding. Since HM-206 has become law, will a new DOT chart be coming out soon?

Thank you so much for your assistance in this matter.

Yours Truly,
Marilynn Dunn


encl.

