



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

1200 New Jersey Avenue, SE
Washington, D.C. 20590

JAN 27 2014

Mr. Tom Cloud
Universal Well Services, Inc.
18360 Technology Drive
Box 4
Meadville, PA 16335

Ref. No. 13-0230

Dear Mr. Cloud:

This responds to your November 19, 2013, request for clarification of the placarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if placing a sign to designate a non-hazardous material being transported in a placard holder is authorized under the HMR.

In your incoming letter, you state that you intend to use a placard holder to indicate a non-hazardous material, a type of sand, being transported on sand haulers. The placard holder will be positioned in a square rather than a square-on-point orientation. You will insert clear plexiglass with the grade of sand printed on the plexiglass into the placard holder (See enclosed photographs). The purpose of the sign is, during the unloading process, to alert the driver of a vehicle behind the sand hauler of the specific type sand to be unloaded. You ask if this is authorized under the HMR.

Section 172.502(a)(2) provides that: [N]o person may affix or display on a packaging, freight container, unit load device, motor vehicle or rail car...any sign, advertisement, slogan (such as "Drive Safely"), or device that, by its color, design, shape, or content, could be confused with any placard prescribed in this subpart.

This prohibition is intended to limit the potential dilution of hazard communication provided by the appropriate hazardous materials placards. The display described in your letter and shown in the enclosed photographs is not similar to hazardous materials placards, and would not be confused with prescribed placards in the HMR. Therefore, the display described in your letter and shown in the enclosed photographs would not be prohibited under § 172.502(a)(2).

I hope this answers your inquiry. If you need additional assistance, please contact this office at (209)366-8553.

Sincerely,

Robert Benedict
Chief, Standards Development Branch
Standards and Rulemaking Division

Boothe
§172.516,
Placarding
13-0230

REQUEST FOR INTERPRETATION FROM PHMSA - PLACARD HOLDER FOR SAND SIGN

Universal Well Services, Inc. is a pressure pumping company in the oil and gas field industry.

We transport hazardous materials. We have a regulation placard holder that we want to use as a holder for our sand haulers. The sign within the holder will designate the type of sand being hauled. We transport three different grades of sand. The sign within the holder will be placed on the lower rear of the sand hauler (see enclosed photo). It will be placed on the vehicle not in square on point (as a hazmat placard would), so as not to be confused with a hazmat placard.

The purpose of the sign is to alert the driver of the pumper vehicle behind it that the sand it will be receiving from the hauler is the correct type for the job stage coming up.

The insert into the placard holder is a clear plexiglass. The grade of sand is printed on the plexiglass. A photo is attached as an illustration.

IS USING THE PLACARD HOLDER IN THIS MANNER IN CONFLICT WITH THE HAZMAT REGULATIONS OR DO WE HAVE TO COME UP WITH A DIFFERENT TYPE OF HOLDER SO AS TO AVOID ANY CONFUSION?

Tom CLOUD

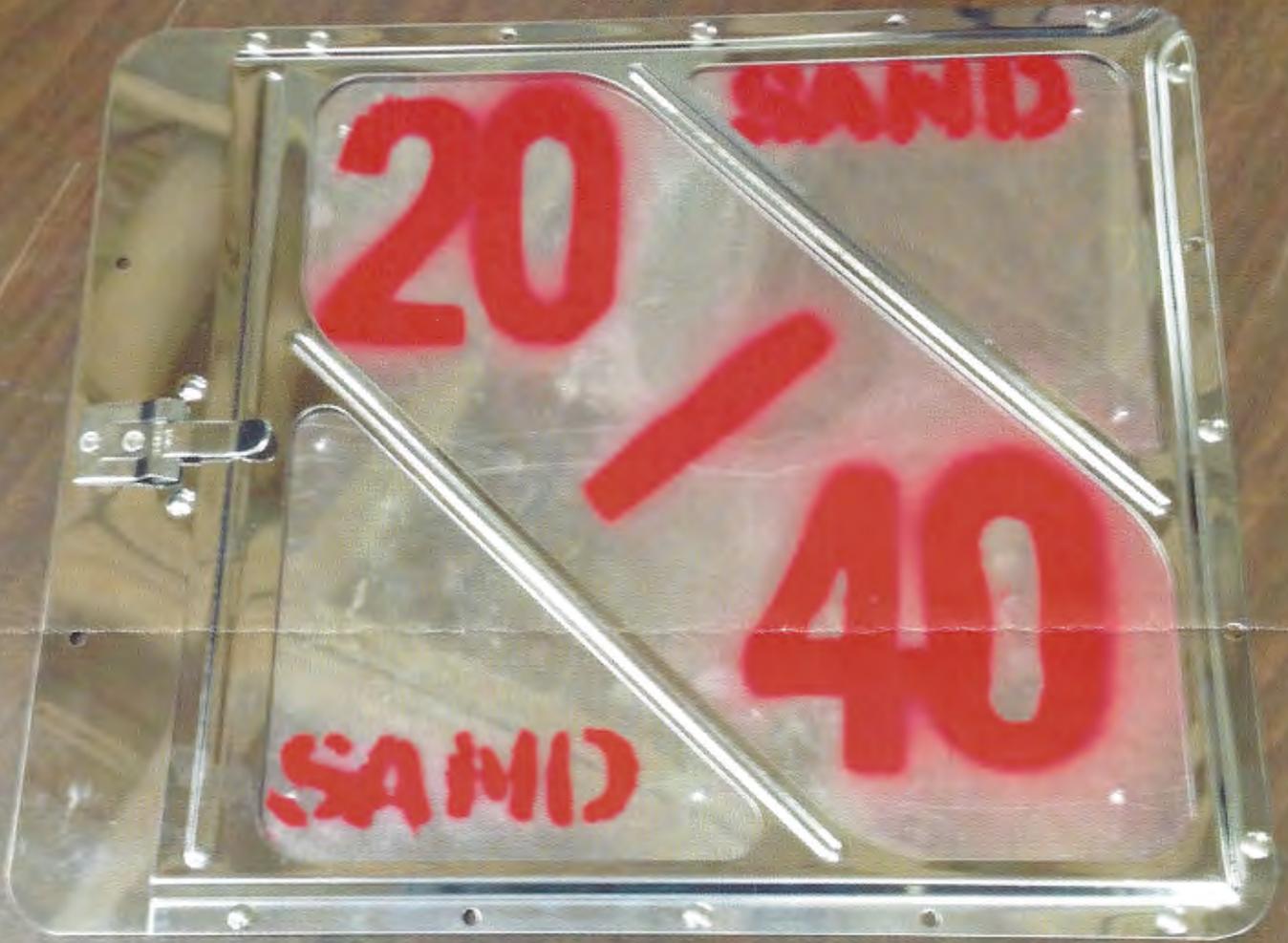
UNIVERSAL WELL SERVICES, INC.

18360 TECHNOLOGY DR., Box 4

MEADVILLE, PA. 16335

OFFICE: 814-373-3251

CELL: 724-866-2044



Tom Cloud

From: Chuck Curry
Sent: Monday, November 04, 2013 11:53 AM
To: Tom Cloud
Subject: Pics



Sent from the Samsung Galaxy Rugby Pro, an AT&T LTE smartphone

