



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

SEP 19 2016

Bruce Biehl
Director of Regulatory Compliance Systems
Brenntag North America, Inc.
2000 East Pettigrew St
Durham, NC 27703

Ref. No. 16-0069

Dear Mr. Biehl:

This responds to your April 18, 2016 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to placarding. You ask whether a placard with a white center block intended for display of identification numbers may remain blank and be used to satisfy the placarding requirements in Subpart F of Part 172.

The answer is no. A placard with a blank white space (i.e., white center block) is only authorized for display of identification numbers in conformance with § 172.332(c). If a placard is not used for the display of an identification number, it must conform to the design requirements of § 172.519(b) which does not accommodate a blank white space in the center of the placard.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Dirk Der Kinderen".

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Ciccarone
172 504
Placarding
16-0089

Goodall, Shante CTR (PHMSA)

From: Geller, Shelby CTR (PHMSA)
Sent: Monday, April 18, 2016 10:03 AM
To: Hazmat Interps
Subject: FW: Placards

Dear Shante and Alice,

Forwarded is a request for a formal letter of interpretation. Mr. Biehl spoke with Jordan Rivera in the HMIC.

Thanks,
Shelby

From: Bruce Biehl/Mid-South/Brenntag [<mailto:BBiehl@brenntag.com>]
Sent: Monday, April 18, 2016 4:05 AM
To: PHMSA HM InfoCenter
Subject: RE: Placards

Can a placard with the white center block with no numbers i.e. Blank be used in place of a standard placard.

In other words, the shipment requires a placard but does not require the use of a numbered placard. The placard holders are permanently attached to the vehicle that are the ones with the white center field designed for display of the UN number. Can these be used to placard the shipment with the center field blank white not displaying any numbers?

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