



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

March 27, 2025

James Lynn
Transportation Compliance Specialist
CleanHarbors Environmental Services
20 Tucker Drive
Caseyville, IL 62232

Reference No. 24-0123

Dear Mr. Lynn:

This letter is in response to your November 20, 2024 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to placarding. Specifically, you request clarification regarding the usage of the DANGEROUS placard for bulk and non-bulk packages containing hazardous materials loaded at one location in accordance with § 172.504(b).

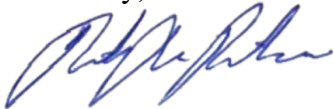
Your questions are paraphrased and answered below:

- Q1. For a mixed load of bulk and non-bulk packages, must the gross weight of the bulk package(s) be considered when determining eligibility of the use of a DANGEROUS placard?
- A1. No. The DANGEROUS placard applies only to non-bulk packages of hazardous materials, in accordance with § 172.504(b).
- Q2. If the aggregate gross weight for a particular hazardous material class—including the weight of any bulk package(s)—exceeds 2,205 pounds, must the vehicle be placarded for non-bulk packages of that hazard class even though the aggregate gross weight of the non-bulk packages does not meet the 2,205 pounds aggregate gross weight requirement separately?
- A2. No. See answer A1.
- Q3. You provided an example of a transport vehicle loaded with a Class 8 bulk package at 2,500 pounds, an aggregate of Class 8 non-bulk packages at 500 pounds, an aggregate of Class 3 non-bulk packages at 500 pounds, and an aggregate of Division 4.1 non-bulk packages at 500 pounds. Are the Class 8 non-bulk packages covered by the DANGEROUS placard or does the presence of the Class 8 bulk package on the transport vehicle necessitate placarding for the Class 8 non-bulk packages?

A3. The Class 8 non-bulk packages are covered by the DANGEROUS placard. A transport vehicle which contains non-bulk packages with two or more categories of hazardous materials that require different placards specified in table 2 of paragraph (e) of § 172.504 may be placarded with a DANGEROUS placard instead of the separate placarding specified. As provided in your example, none of the representative hazard classes in non-bulk packages exceed 2,205 pounds in the aggregate including the Class 8 non-bulk packages.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

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

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

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: RE: Interpretation on the use of Dangerous
Date: Monday, December 2, 2024 3:41:18 PM
Attachments: [image001.png](#)
[image002.png](#)

Good afternoon,

Please see the below interpretation request. Let us know if you need anything.

Sincerely,
Janaye

From: INFOCNTR (PHMSA)
Sent: Wednesday, November 20, 2024 3:30 PM
To: Hazmat Interps <hazmatinterps@dot.gov>
Subject: FW: Interpretation on the use of Dangerous

Hello Hazmat Interps,

Please see below request for Letter of Interpretation.

Thanks,
Jonathon, HMIC

From: Lynn, James D <James.Lynn@safety-kleen.com>
Sent: Wednesday, November 20, 2024 12:03 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Interpretation on the use of Dangerous

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good Day,

I have a question pertaining to the use of the dangerous placard requirements 172.504(B). If you have a mixed load loading at one location bulk and non-bulk containers. Would you include the weight of the bulk containers hazard class to determine the 2205lbs for the use of Dangerous. My question is pertaining to the fact that if the aggregate weight of the HM class exceeds the 2205lbs with the bulk container would the non-bulk have to be placarded for the specific class, or could it be covered by the dangerous if the non-bulk container didn't meet the requirement separately.

Example:

Class 8 bulk container @2500lbs

Class 8 non-bulk @500lbs

Class 3 non-bulk @500lbs

Class 4.1 non-bulk @500lbs

I know the bulk needs to be placarded with the ID number . I am curious if the non-bulk class 8 @500lbs would be able to be covered by the dangerous or would that HM class have to be placarded separately also.

Thank you.

James Lynn

Transportation Compliance Specialist

CleanHarbors Environmental Services

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