



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

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

MAY 09 2013

Mr. HC Brown
Manager
Texkota Transit, LLC
P.O. Box 2001
Kilgore, TX 75663

Ref. No.: 13-0086

Dear Mr. Brown:

This is in response to your April 24, 2013 email, concerning the display of placards on motor vehicles. You asked whether the display of two-sided placard affixed on the crossbar of a headache rack (approximately six inches behind and even in height with the cab), with one placard visible from the front, one from the rear, would comply with the placarding requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

The answer to your question is no. When placarding is required by § 172.504 of the HMR, a transport vehicle must be placarded "on each side and each end." The placarding scenario that you describe in your letter does not meet the requirement in § 172.504 for placarding on each side and each end of a transport vehicle.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Delmer Billings".

Delmer Billings
Senior Regulatory Advisor
Standards and Rulemaking Division

Drakeford, Carolyn (PHMSA)

Wiener
§172.516
Placarding
13-0086

From: INFOCNTR (PHMSA)
Sent: Friday, April 26, 2013 2:30 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: 172.516 Placarding

Hi Carolyn,

This caller requested we submit his e-mail as a formal letter of interpretation.

Thanks,
Victoria

From: Textkota Transit [<mailto:textkotatransitllc@yahoo.com>]
Sent: Wednesday, April 24, 2013 4:10 PM
To: INFOCNTR (PHMSA)
Subject: 172.516 Placarding

I plan to operate a Dodge Crew Cab 5500 single axle vehicle with an 11' flat bed. I have a headache rack that is approximately 6" behind the cab and the height is even with said cab. According to regulation 172.516 paragraph (a) "each placard must be clearly visible from the direction it faces" My desire is to affix a two sided placard(s) on the cross bar of the headache rack with one side facing forward and the other side facing the rear. The visibility from both directions would be greatly enhanced and protection of the placard(s) from road debris, mud, and unfortunate incidents with other vehicles would be more secure. Your consideration and hopefully positive interpretation is greatly appreciated.

HC Brown Manager
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