



26-0069
Cardez

Fwd: Letter of Interpretation Request

INFOCNTR (PHMSA)

Tue, Jun 2, 2026 at 1:19 PM

Good afternoon,

Please see the following interpretation request.

The mailing address is:

8521 McHard Rd
Houston, TX 77053

Let us know if you need anything,

Janaye

----- Forwarded message -----

From: **Phil Carpenter** <pcarpenter@thetroycompanies.com>
Date: Mon, Jun 1, 2026 at 11:45 AM
Subject: Letter of Interpretation Request
To: phmsa.hm-infocenter@dot.gov <phmsa.hm-infocenter@dot.gov>

To Whom it May Concern:

I am writing to request clarification on the meaning of “substantially reduced” as used in Section 172.516(c)(6).

I have attached a photo of the placard in question, which is affixed to the center of the front bumper of a fuel tank truck. Because the bumper has two cut-outs for the tow hooks, the placard must be positioned in the center section to remain clearly visible from the front. This placement causes one corner of the placard to extend over a cut-out.

Although this results in a small portion of the corner being unsupported, the format, legibility, color, and overall visibility of the placard are not impaired. All symbols, text, and numbers remain fully intact and clearly readable. A reasonable person can easily recognize it as a hazardous materials placard and identify the primary hazard symbol, hazard class, and UN/NA number.

Could you please provide guidance on whether this placard would be considered to have a “substantially reduced” condition under the regulation, which requires that placards be “maintained by the carrier in a condition so that the format, legibility, color, and visibility of the placard will not be substantially reduced due to damage, deterioration, or obscurement by dirt or other matter”?

Thank you for your time and assistance. I look forward to your response.

Sincerely,

Phil Carpenter

DOT Compliance Manager

pcarpenter@thetrovcompanies.com

thetrovcompanies.com

O: 281.437.8214:1105

C: 832.651.4630



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Placard.jpg
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