



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

OCT 08 2019

Michael Herron
Transportation Compliance Manager
US Ecology, Inc.
17440 College Parkway
Suite 300
Livonia, MI 48152

Reference No. 19-0087

Dear Mr. Herron:

This letter is in response to your June 28, 2019, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the visibility of a placard on the outside of a transport vehicle. Specifically, you ask whether the placards shown in the photographs provided are affixed on a contrasting background, in accordance with § 172.516(c)(7).

The answer is yes. Based on the photographic evidence, the red upper and lower triangles, and black inscription on the placard sufficiently contrast with the white background of the transport vehicle such that the placard is clearly visible.

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

Sincerely,

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

Ciccarone
§ 172.516 (c)
19-0087

Dodd, Alice (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Monday, July 01, 2019 2:00 PM
To: Hazmat Interps
Subject: FW: Interpretation request
Attachments: dangerous placard.png; Side 1.jpg; side 2.jpg; Back.jpg

Hello Alice and Ikeya,

Please see the request for a letter of interpretation below and the attached pictures. A specialist provided a couple of letters to Mike but he would like further clarification on his scenario.

Thanks,

Lysie, HMIC

From: Mike Herron [mailto:Michael.Herron@usecology.com]
Sent: Friday, June 28, 2019 5:16 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Interpretation request

I'd like to request an interpretation of Title 49 CFR 172.516 (c) (7) regarding placards being affixed on a contrasting background. We recently received a violation for dangerous placards being displayed on a non-contrasting background. I have attached photographs of the placards as they were displayed on the vehicle for your review. Please note that this was a rental vehicle and we could not mount placard holders on the vehicle.

The photographs show that the placards are displayed on a white box-truck vehicle. Please review the attached photos and advise if they appear to be displayed in compliance with 172.516 (c).

I can be reached by the mailing address and/or email address shown below-

US Ecology, Inc.
Attn: Michael Herron
17440 College Parkway Suite 300
Livonia, MI 48152

I appreciate your assistance in this matter,

Michael Herron

michael.herron@usecology.com



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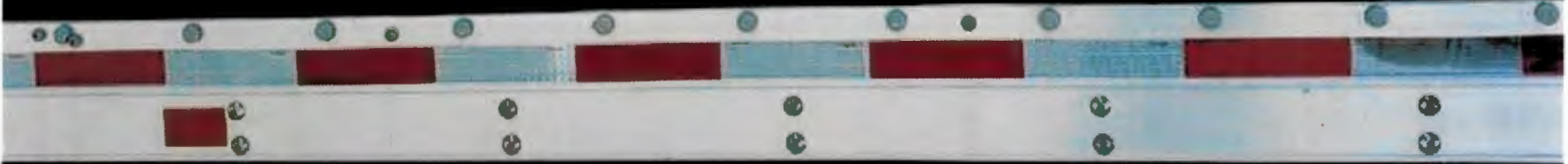


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