



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

February 10, 2020

Bill Krause
Dru Chem Inc.
1329 County Road 358
P.O. Box 1088
El Campo, TX 77437

Reference No. 19-0124

Dear Mr. Krause:

This letter is in response to your October 16, 2019, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the visibility and display of placards. You explain that your company occasionally transports small loads of oilfield chemicals using a 1-ton flatbed motor vehicle, which is required to display hazardous materials placards on all four sides. You provide photographs illustrating the placement of placards mounted to your flatbed vehicle. Instead of facing the forward direction on the front portion of the vehicle (e.g., the grill), the placards are mounted on top of the "headache rack" (i.e., rear of the cab as shown in the photographs provided) and displayed to the front. Specifically, you seek confirmation that having the placards mounted on top of the "headache rack" and facing forward is permissible in accordance with the HMR.

Yes, based on the photographs you provided, the placards mounted on the "headache rack" would be permissible. In accordance with § 172.504(a), a transport vehicle containing any quantity of hazardous materials must be placarded on each side and each end. The display and visibility of that placard must comply with § 172.516(a), by which each placard must be clearly visible from the direction it faces. The placards on the "headache rack" are clearly visible from the direction they face.

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

Baker

19-0124

Dodd, Alice (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Thursday, October 17, 2019 1:38 PM
To: Hazmat Interps
Subject: FW: Placard Interpretation

Hello Alice and Ikeya,

Please see below for letter of interpretation request. The requester spoke with Sarah and Lynsey in the HMIC. We provided him with letter 13-0086 and said that the regulations do not specify where on the front of the cab the placard has to be, and neither does this letter. According to 172.516 it is based on being clearly visible from the direction it faces. He is deciding to move forward with an LOI to confirm that he can put his placard on a "headache rack."

Please contact our office with any questions.

Thank you,
Kathryn, HMIC

From: William Krause [mailto:wdk49model@yahoo.com]
Sent: Wednesday, October 16, 2019 4:13 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Druchem <druchem@sbcglobal.net>
Subject: Placard Interpretation

I am a safety consultant for a company that transports oilfield chemicals. On our larger trucks we don't have a problem but we have a 1 ton flatbed we use on small loads. We have been stopped by Texas DPS and advised that our placards are not properly displayed to the front. We mounted 4 placards on top of the headache rack displayed to the front. The Trooper said they have to be mounted on the front of the vehicle. If we mount them on the front bumper they block the headlights and radiator. If we lower them they will drag on the ground. The sides and rear are no problem.

Could we get something in writing saying this is alright or please offer a solution to our problem.

Thank You,
Bill Krause
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979-543-6843







