



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

April 17, 2020

Corporal Casey Jones  
Texas Department of Public Safety  
Texas Highway Patrol – Commercial Vehicle Enforcement  
600 W. Kilpatrick  
Cleburne, TX 76033

Reference No. 20-0003

Dear Corporal Jones:

This letter is in response to your January 16, 2020, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to placarding. Specifically, you ask about the proper location for placards for compliance with the placement and visibility requirements in §§ 172.504 and 172.516.

We have paraphrased and answered your questions as follows:

- Q1. You provided pictures in which a placard is displayed on the front face of the cargo tank portion of a truck (visible from the front on one side), and displayed on the “headache rack” of flatbed trucks, instead of the cab portion of the transport vehicle. You ask whether the front placard must be attached to the front of a unit truck (i.e., grille or front bumper).
- A1. The answer is no. The HMR do not limit the placement of the front placard to the truck cab; placement on the tank portion of the truck is appropriate and placement on a “headache rack” is acceptable (see Letter Ref. No. 19-0124), so long as it is visible when facing the front of the truck. However, we have concerns that the placement of the placard shown in the picture of the bobtail truck you submitted does not appear to fully meet the visibility requirements, as the placard is obscured by the truck’s mirror and appears to be visible from only one side of the truck. Although, from the picture alone, we cannot tell if there is another placard on the opposite side of the cab.
- Q2. You ask whether side placards must be placed on the outermost edge of a vehicle or what distance inward from the outermost edge is appropriate for side placards.

A2. The answer is no. Appropriate placard placement is not limited to the outermost edge of the truck. The HMR do not specify a distance from the edge of the side of a transport vehicle at which a placard is required. Any location that satisfies the conditions of § 172.516 is suitable for placard placement.

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', written in a cursive style.

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

Balance

20-0003

**Dodd, Alice (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Friday, January 17, 2020 11:55 AM  
**To:** Hazmat Interps  
**Subject:** FW: Request for PHMSA letter of interpretation  
**Attachments:** Placard Interp.pdf; INTERP CASEY JONES.docx

Hello Alice and Ikeya,

Attached is a request for interpretation.

Thanks,

Jonathon

**From:** Jones, Casey [mailto:Casey.Jones@dps.texas.gov]  
**Sent:** Thursday, January 16, 2020 1:00 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request for PHMSA letter of interpretation

Please see attached interpretation request.

**Corporal Casey Jones**  
**Commercial Vehicle Enforcement**  
**Texas Highway Patrol Division**

Hello Alice and Ikeya,

The caller provided many letters of interpretation (13-0086, 14-0183, 88-0045, 00-0192, 99-0048) that discuss the proximity of placards to the actual ends or sides of the vehicle. Ultimately the caller wants to know what is close enough to be considered on the end or side.

Thanks,

Jonathon

# TEXAS DEPARTMENT OF PUBLIC SAFETY

5805 N LAMAR BLVD • BOX 4087 • AUSTIN, TEXAS 78773-0001

512/424-2000

[www.dps.texas.gov](http://www.dps.texas.gov)



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January 16, 2020

Hazardous Materials Standards and Rulemaking  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Letter of Interpretation for Placard Placement 49 CFR §172.504

Dear Sir or Madam,

There is some confusion not only with industry but also with enforcement when it comes to the proper placement of a placard on a transport vehicle when placards are required. The wording in 172.504 simply states "on each side and each end" which does seem self-explanatory. Past interpretations seem to contradict themselves or just not clarify the difference between the placement requirement of 172.504 and the visibility requirement of 172.516. More specifically, the confusion seems to be what is considered to be the actual ends and sides of a transport vehicle. The idea that a placard simply has to be visible to the direction it is facing is the prevailing thought. I have included some photos of single unit trucks that have a front placard which is facing and visible to the front, but are located behind the cab of the truck, not on the actual front end of the truck. I am also including a photo of a flatbed semi-trailer which is displaying its side placard on a placard holder that has been mounted approximately 7.5 inches inward from the actual side of the trailer. This placement seems to be practical to help minimize damaging the placard, but is not the actual side of the trailer. Some carriers have even mounted the side placard to the trailer main frame rail under the flatbed which is approximately 2.5 feet inward from the outer edge of the trailer.

1. When a transport vehicle is required to be placarded, does a front placard have to be on the actual front end of a single unit truck (the grille or front bumper)?
2. When a transport vehicle is required to be placarded, do side placards have to be placed on or at the actual outermost edge of a vehicle? If not, what would be an appropriate distance inward from the outermost edge?

Respectfully Submitted,

Cpl. Casey Jones  
Texas Dept. of Public Safety  
Texas Highway Patrol- Commercial Vehicle Enforcement  
600 W. Kilpatrick  
Cleburne, TX 76033  
(817) 202-2450













