

Pipeline and Hazardous Materials Safety Administration

April 30, 2020

Robert Dritschel Director of Regulatory Affairs Reagent Chemical & Research Inc. 115 US Highway 202 Ringoes, New Jersey 08551

Reference No. 20-0014

Dear Mr. Dritschel:

This letter is in response to your January 31, 2020 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to placarding. Specifically, you ask whether utilizing a blue boarder around the edge of your Class 8 (corrosive) material placard meets the requirements of § 172.516(c)(7).

In your letter, you provided a picture of the placard affixed to a white cargo tank. Based on this picture, the answer to your question is yes. If the placard still meets the requirements of §§ 172.519 and 172.558, a thick blue boarder around the placard may be used to meet the requirements of § 172.516(c)(7).

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

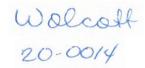
Sincerely,

T. Glenn Foster

Chief, Regulatory Review and Reinvention Branch

Standards and Rulemaking Division

J. Allenn Toxton





Reagent Chemical & Research, Inc.

115 US HIGHWAY 202 • RINGOES, NEW JERSEY 08551 OFFICE: (908) 284-2800 • FAX: (908) 284-2113

January 31, 2020

Mr. Shane Kelley Director, Standards and Rulemaking Division U.S. DOT/PHMSA (PHH-10) 1200 New Jersey Avenue, SE East Building, 2nd Floor Washington, DC 20590

Dear Mr. Kelley,

I am writing to you in order to get a formal letter of interpretation on the placarding of a hazardous material bulk trailer.

Reagent Chemical & Research, Inc. distributes hydrochloric acid solution in their privately owned bulk tank trailers for delivery to their customers. These trailers are placarded with a black and white 1789 Corrosive placard as required. It is understood that that the placard must be affixed to a background of contrasting color, or must have a dotted or solid line outer border which contrasts with the background color.

In order to comply with 49 CFR 172.516 (c)(7), the adhesive placard used by Reagent Chemical incorporates a background contrasting color solid outer border and also, as described in 49 CFR 172.519(b)(2), the colored border also indicates the full size of the placard. I have attached a picture of the tank trailer and the placard in question for your review.

Reagent Chemical & Research, Inc. requests your interpretation on the compliance with the hazardous materials placarding regulations of the color-bordered outlined placard in the picture submitted.

Sincerely,

Robert Dritschel, CHMM Director of Regulatory Affairs



