



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 30, 2020

Robert Dritschel
Director of Regulatory Affairs
Reagent Chemical & Research Inc.
115 US Highway 202
Ringoos, 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,

A handwritten signature in blue ink that reads "T. Glenn Foster".

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Wolcott
20-0014



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



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MY LIGHTS
ARE ON
FOR
SAFETY

PLEASE
DO NOT
PECK
ON TANK

CAUTION
THIS VEHICLE
MAKES WIDE
RIGHT TURNS

