



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

November 15, 2021

Mr. Jeff McLaughlin
Pacific Northwest Safety Supervisor
Oak Harbor Freight Lines, Inc.
PO Box 1469
Auburn, WA 98071

Reference No. 21-0077

Dear Mr. McLaughlin:

This letter is in response to your July 19, 2021, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the visibility and display of placards on highway motor vehicles. Specifically, you attach three photographs and ask whether the placards—as displayed in the photographs—meet the requirements of § 172.516.

We have paraphrased and answered your questions with respect to the specific photographs provided as follows:

- Q1. You ask whether the photograph of the oxidizer placard shows the placard as meeting the requirements of § 172.516(c)(6) for format, legibility, color, and visibility of the placard.
- A1. The answer is yes. It is the opinion of this Office that the placard displayed in the photograph has not been “substantially reduced” with respect to its format, legibility, color, and visibility.
- Q2. You further ask whether the oxidizer placard meets the requirements of §§ 172.550 and 172.516(c)(5).
- A2. The answer is yes. The pictured oxidizer placard appears to meet the placard design requirements of § 172.550 and the formatting requirements of § 172.516(c)(5). The minor offset present in the hinged placard pictured neither adversely impacts the legibility of the word “OXIDIZER” nor the format and color of the placard. Please note that other relevant factors for determining placard compliance, including placard size, cannot be determined from this photograph.

Q3. You ask whether the photograph of the flammable placards shows the placards as meeting the requirements of § 172.516(c)(6) for format, legibility, color, and visibility of the placards.

A3. The answer is yes. It is the opinion of this Office that the placards displayed in the photograph have not been “substantially reduced” with respect to their format, legibility, color, and visibility.

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

Patrick

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#); [Hazmat Interps](#)
Subject: FW: Interpretation request
Date: Tuesday, July 20, 2021 11:46:36 AM
Attachments: [Interpretation request.doc](#)

21-0077

Good morning Alice,

Please see the request for a letter of interpretation attached. The corresponding images are also attached. The address is listed on the letter head for the interpretation request. Please contact our office with any questions.

Thank you,

Sarah (HMIC)

From: Jeff McLaughlin <Jeff.McLaughlin@oakh.com>
Sent: Monday, July 19, 2021 6:14 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Jeff McLaughlin <Jeff.McLaughlin@oakh.com>; Tom Mueller <Tom.Mueller@oakh.com>
Subject: Interpretation request

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Please see the attached interpretation request and examples.

Thank you,

Jeff

Jeff McLaughlin
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Jeff.McLaughlin@oakh.com
Phone 509-228-8397/Fax 509-535-0435/Cell 406-899-3085

Oak Harbor Freight Lines, Inc.
"Bringing Peace of Mind Since 1916"