



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

1200 New Jersey Avenue, SE
Washington, DC 20590

August 11, 2022

Mr. Kurt Colborn
ICE Service Group & SPS Packaging Systems
238 Moon Clinton Road, Suite 200
Moon Township, PA 15108

Reference No. 22-0015

Dear Mr. Colborn:

This letter is in response to your February 23, 2022, email and subsequent phone conversation with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the placarding of rail cars. You provide a scenario and photograph in which four freight containers are placed end-to-end lengthwise on a single rail car; however, only one of the four freight containers requires placarding. You state that the freight container which requires placarding is placarded on both sides and both ends; however, both ends are obstructed by the other freight containers in which it is interspersed. You ask whether additional placards must be duplicated on both ends of the single rail car in such a configuration.

The answer to your question is no. Section 172.504 states that "...each bulk packaging, freight container, unit load device, transport vehicle or rail car containing any quantity of a hazardous material must be placarded on each side and each end...." In addition, § 172.516 states that "Each placard on a motor vehicle and each placard on a rail car must be clearly visible from the direction it faces, except from the direction of another transport vehicle or rail car to which the motor vehicle or rail car is coupled. This requirement may be met by the placards displayed on the freight containers or portable tanks loaded on a motor vehicle or rail car." It is the opinion of this Office that for the configuration you describe, there is no need to duplicate additional placards on both ends of the single rail car, since the placards which are currently present—although obstructed by the other freight containers on the single rail car—are facing in the direction of other rail cars to which it is coupled.

Please note that the placards on both sides of the freight container or rail car must remain visible and unobstructed.

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

Sincerely,

A handwritten signature in blue ink, reading "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

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

From: [INFOCNTR \(PHMSA\)](#)
To: [Hazmat Interps](#)
Subject: FW: Interpretation request, placarding
Date: Friday, March 4, 2022 1:49:20 PM
Attachments: [DOT interpretation placards final.pdf](#)

See attached/below request for interpretation.

Thanks,
Jonathon, HMIC

From: Kurt Colborn <kcolborn@iceservicegroup.com>
Sent: Wednesday, February 23, 2022 3:08 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: FW: Interpretation request, placarding

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.

Did not receive an auto reply, so I am resending.

From: Kurt Colborn
Sent: Wednesday, February 23, 2022 1:34 PM
To: infocntr@dot.gov
Subject: Interpretation request, placarding

Please find the attached interpretation request regarding the appropriate placarding of cargo containers on railcars.

Thank you,

Kurt Colborn
Compliance and Quality Assurance
I.C.E. Service Group & SPS Strategic Packaging Systems
238 Moon-Clinton Road, Suite 200
Moon Twp., PA 15108

Cell: 724-544-5815



Dirk Der Kinderen
Chief, Standards Development Branch
U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590
Via email: infocntr@dot.gov

February 23, 2021

SUBJECT: Placarding Requirements for Arrangements of Bulk Containers on Railcars

Dear Mr. Der Kinderen,

The purpose of this letter is to request confirmation of our interpretation of the requirements of 49 CFR 173.504 and 173.516. Specifically, this letter seeks concurrence that the placarding practice described herein meets the requirements of those and related sections.

We have occasion to offer freight containers (and/or bulk intermodal IP-1 containers) for rail transportation. We understand that freight containers must be placarded on all four sides, and that the placards on these containers may be used to meet the requirement for placarding the railcar. We also understand that placards on a railcar must be visible in transport, except in the direction of another railcar.

We are addressing placard placement when several freight containers or bulk intermodal IP-1 containers are placed on a railcar end-to-end, but are themselves mixed with regard to placarding, with as few as one container on the railcar requiring placards. Depending on the arrangement of containers (which is not discretionary and is likely to be driven by center-of-gravity calculations), one or more placards on a container will not be visible in the direction or adjacent railcars and containers. We maintain that this is compliant with regulations, and that placarding the railcar is not required.

In our evaluation, we noted that placarding the ends of the railcar will not remedy the visibility issue with the container, since (as the regulations indicate) the ends of the car are hidden from view by the cars they are coupled to. We also considered that full or partial (front and/or rear) placarding the railcar might confuse inspectors of the loaded railcar, or confuse responders to an event where the unplacarded containers became separated from a placarded railcar.

Your comments or concurrence with our approach to placard placement is requested. A photograph of the proposed arrangement (one container, placarded on all 4 sides, on a railcar with 3 unplacarded containers) is provided below.



Our typical scenario is shipping Class 7 LSA Exclusive Use, using railcars and containers equipped with standard intermodal locking devices. We would welcome a more general response with addresses other hazards, and truck shipments for containers and trailers also equipped with intermodal locking devices.

Illustration: 2nd package from left is placarded on all 4 sides



Respectfully submitted,

Kurt Colborn

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