



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

1200 New Jersey Avenue, SE
Washington, DC 20590

September 29, 2022

Mr. Albert R. Vandaveer
Haliburton HRD
4375 S. Loop 1604 E.
Elmendorf, TX 78114

Reference No. 16-0166R

Dear Mr. Vandaveer:

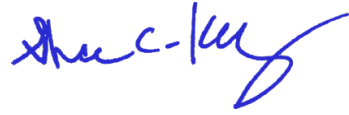
This letter is in further response to your October 12, 2016, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to placarding. In your letter, you describe a scenario in which a pickup truck is pulling a trailer containing hazardous material in an amount which requires placarding. Specifically, you ask whether the front of the pickup truck may be placarded to satisfy the front placard requirement prescribed in § 172.504(a).

We note that you did not specify whether the pickup truck in your scenario has a fifth wheel and would be considered a “truck-tractor,” or has a traditional “ball and hitch” set up. The term “truck-tractor” is defined in 49 CFR 390.5 of the Federal Motor Carrier Safety Regulations (FMCSR) as “a self-propelled commercial motor vehicle designed and/or used primarily for drawing other vehicles.” Section 172.516(b) of the HMR states that the required placarding of the front of a motor vehicle may be on the front of a truck-tractor instead of or in addition to the placarding on the front of the cargo body to which a truck-tractor is attached. Therefore, if the pickup truck in your scenario is a truck-tractor, the required placarding of the front of a motor vehicle may be on the front of a truck-tractor instead of or in addition to the placarding on the front of the cargo body to which a truck-tractor is attached.

If the pickup truck in your scenario is not a truck-tractor, the required placards must be displayed on each side and each end of the trailer containing the hazardous materials.

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 "Shane C. Kelley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Shane C. Kelley
Director
Standards and Rulemaking Division
Office of Hazardous Materials Safety