



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

JAN 4 2006

400 Seventh Street, S.W.  
Washington, D.C. 20590

Mr. John Stolpe  
4007 Marion Way  
Long Beach, CA 90807

Reference No.: 05-0276

Dear Mr. Stolpe:

This responds to your letter requesting clarification of the marking and placarding requirements under the Hazardous Material Regulations (HMR; 49 CFR Parts 171-180). You ask if a freight van containing non-bulk packages of a single hazardous material with an aggregate gross weight of 4,000 kg (8,820 lbs.) must be marked with the identification number on each side and each end. You also submitted pictures of placarded freight containers displaying the identification (ID) number on the placards. In each picture, the placards are distorted because of the corrugated background of the freight container and only 2 digits of the ID number are clearly visible. You ask if this limited visibility of the ID numbers is acceptable under the HMR.

In accordance with § 172.301, a transport vehicle or freight container containing only a single hazardous material in non-bulk packages must be marked on each side and each end with the identification number specified for the hazardous material in the § 172.101 Table. As to your second question, the HMR do not prohibit placards and ID number markings from being placed on a corrugated surface if the placards and markings comply with the visibility and display requirements specified in § 172.516. Specifically, each placard and ID marking must be clearly visible from the direction it faces. As shown in the photographs you submitted, the placards and markings are not clearly visible from the direction they face, thus, they do not conform to the HMR.

I trust this satisfies your request.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



050276

172.301(a)  
172.516

October 23, 2005

Office of Hazardous Materials Standards  
Research and Special Programs Administration  
Attn: DHM-10, US Department of Transportation,  
400 7<sup>th</sup> Street SW  
Washington, DC 20590-0001

Corbin  
§ 172.301(a)  
Markings  
05-8276

Dear RSPA

Question: when transporting a hazardous material a non-bulk hazard at a single commodity over 8,820 pounds in a freight van, is the container required to be marked with the proper identification numbers on all four sides, as set in 172-301(a) CFR.

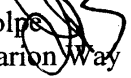
If the answer is yes, then do the identification numbers must be all read from left to right? Being able to read all four numbers as set in 172-101 HMT, example if the freight van was filled with 72-drums of: Ethly phosphonothioic dichloride, anhydrous, 6.1, UN2927, PGI, 40,000 pounds. (No other hazards)

If the numbers on a placard could not be read form left to right is this violation? And what would be the citing authority?

Please look at provided photos clearly showing the ID-numbers affixed to the front of a freight van, which is not displaying all four numbers in the required sequence.

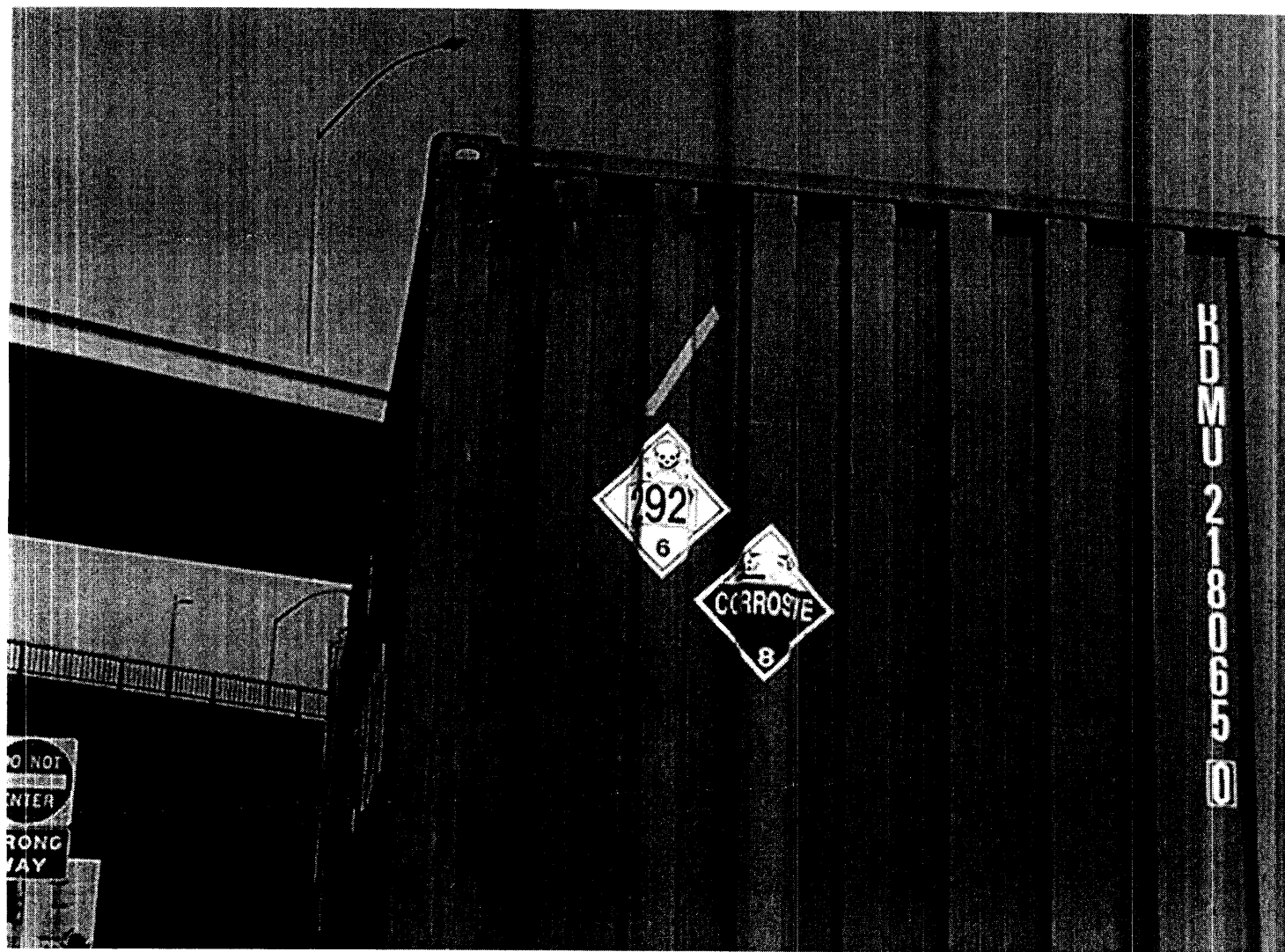
Attached: four photos of ID-numbers not being properly displayed, photos were taken while standing in front of the freight vans. All freight vans had a single hazard, with nothing else being transported.

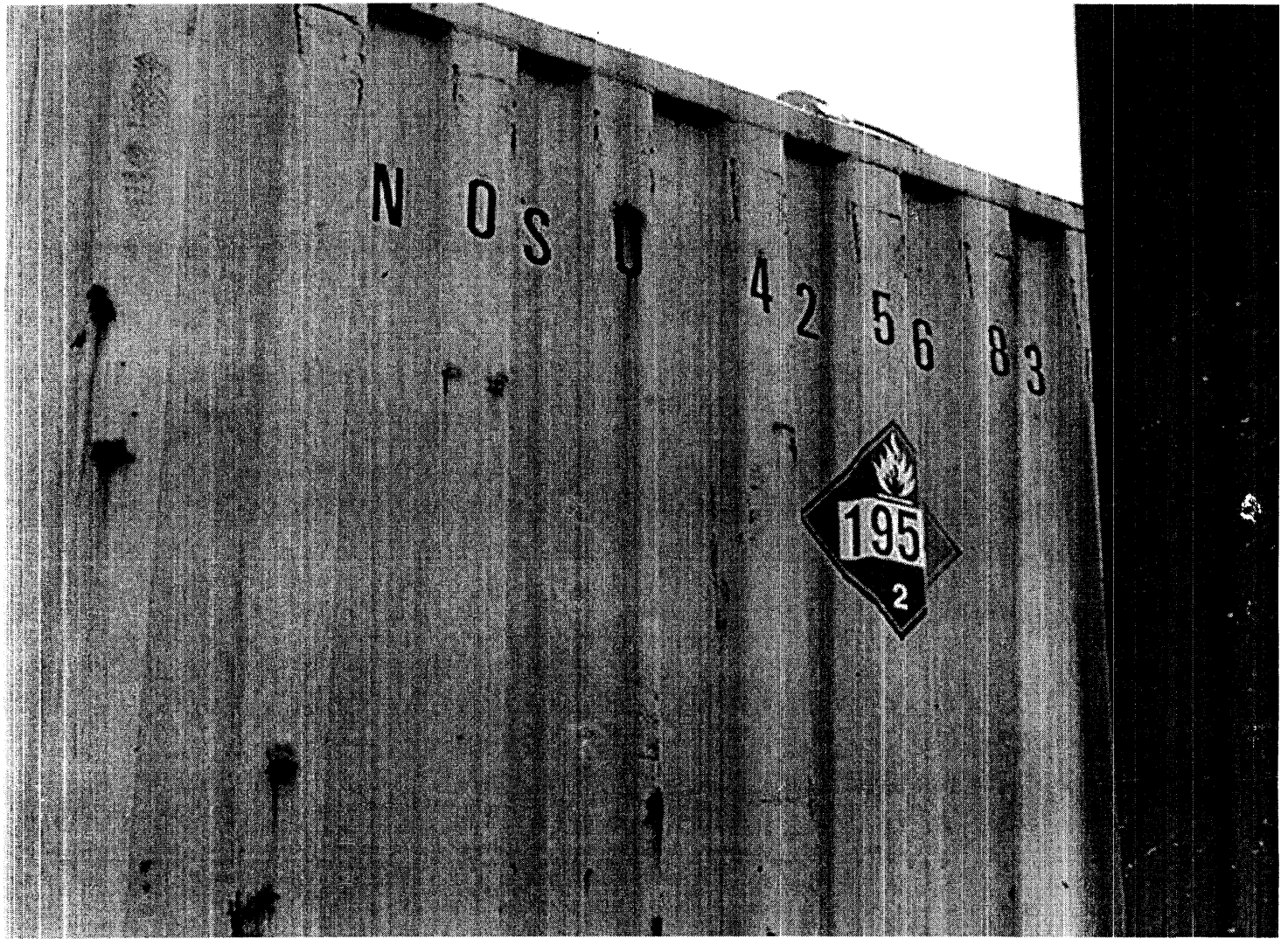
Thank you for looking into this matter.

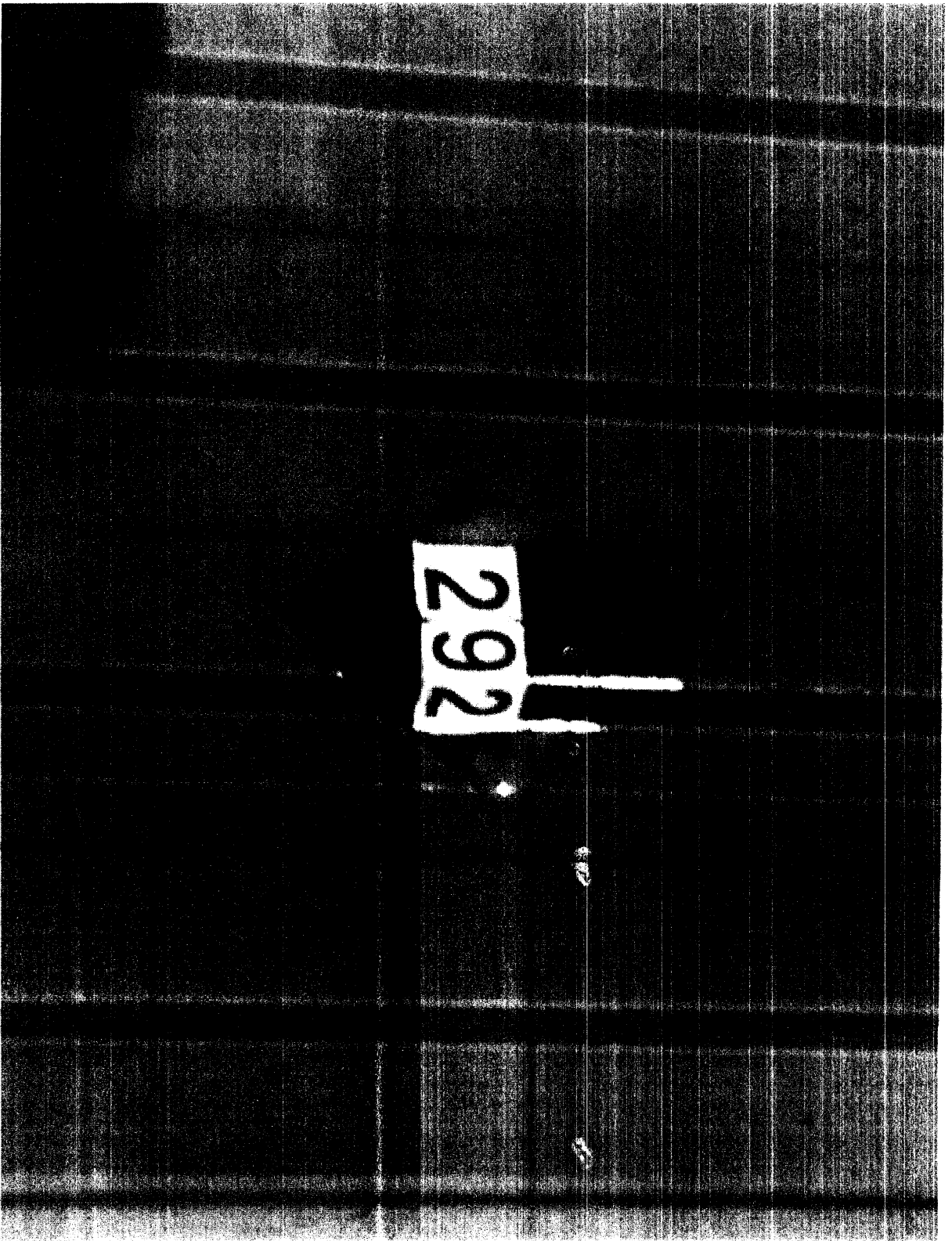
  
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HDMU 218065 0







Front of freight container with ID-Numbers not being displayed all four form left to right. Is this a violation? and what section to cite ?