



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

JAN 11 2016

Ms. Shannon Schick
Bulk Hazardous Materials Manager
Schneider National Bulk Carriers
1555 Glory Road
Green Bay, WI 54304

Ref. No.: 15-0224

Dear Ms. Schick

This responds to your letter dated November 17, 2015, requesting clarification on whether affixing placards to a motor vehicle with tape satisfies the requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). In your letter you enclose a picture and describe a method of affixing placards by placing duct tape along the outer borders of a placard in which the tape covers only the border of the placard and does not obscure any part of the surface other than the borders.

The method described in your email and the picture is an acceptable method of affixing a placard provided the placard is securely attached or affixed (see § 172.516(c)(1)). Also, the HMR require a placard to be affixed to a background of contrasting color or have a dotted or solid line outer border which contrasts with the background color (see § 172.516(c)(7)). The dotted line border is not part of the placard specification. However, a dotted or solid line outer border may be used when needed to indicate the full size of a placard that is part of a larger format or is on a background of a non-contrasting color (see 172.519(b)(2)).

I hope this answers your inquiry. If you need additional assistance, please contact the Standards and Rulemaking Division at (202) 366-8553.

Sincerely,

Duane A. Pfund
International Standards Coordinator
Standards and Rulemaking Division

heary
§ 172.516
Placarding
15-0224

Goodall, Shante CTR (PHMSA)

From: Geller, Shelby CTR (PHMSA)
Sent: Thursday, November 12, 2015 12:22 PM
To: Hazmat Interps
Subject: FW: Request for Interpretation
Attachments: FullSizeRender.jpg

Dear Shante and Alice,

Forwarded is a request for a letter of interpretation. Ms Schick spoke with Eamonn Patrick in the info center.

Thanks,
Shelby

From: Schick, Shannon [<mailto:SchickS@schneider.com>]
Sent: Wednesday, November 11, 2015 12:30 PM
To: INFOCNTR (PHMSA)
Subject: Request for Interpretation

Good Afternoon,

I'd like to request an interpretation in reference to 172.516, specifically around visibility and display of the placards. While placard holders are typically considered the best means of securing a placard to a trailer we periodically find that we are in a situation where we must display multiple placards and do not have available placard holders for all of them and self-adhesive placards aren't immediately available. That said, it was industry practice some years ago to secure them to the trailer using duct tape on the outer boundary of the placards. Some years ago we started receiving warnings and violations for doing this.

To clarify the tape is only on the outer boundary and would not come in to contact with the separation line leading to the 'inner-workings' of the placard (please refer to attached picture). At such time we were advised that clear duct tape would be an acceptable alternative so we started using that (I will add at a much higher cost than standard duct tape). To be fair, clear duct tape isn't a fully accurate description as its not perfectly transparent like clear packing tape. Clear packing tape however does not hold up well with any dirt, moisture, or wind and you will now likely find yourself in violation due to missing placards without the use of a tape with a more robust adhesive.

172.516(d)

(d) Recommended specifications for a placard holder are set forth in appendix C of this part. Except for a placard holder similar to that contained in appendix C to this part, the means used to attach a placard may not obscure any part of its surface other than the borders.

After reviewing this section it seemed like we are operating within the regulations regardless of the color of the tape itself provided the tape does not exceed or touch the boundary line separating the inner & outer portions of the placard. Is this an acceptable practice to follow or are there alternative options outside of the above referenced options that can help us maintain compliance with the requirements of this section?

You can reach me by email or mail, mailing address below.

Mailing Address:
Schneider National Bulk Carriers
Attn: Shannon Schick

1555 Glory Road
Green Bay, WI 54304

Thanks in advance,

Shannon Schick
Bulk Hazardous Materials Manager
Schneider National Bulk Carriers
920-592-5048
Mailstop: US.GRB.02.01.04



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