



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

APR 17 1998

Mr. John N. Thompson
Hazardous Materials Specialist
BOC Gases
P.O. Drawer No. 272
Riverton, NJ 08077

Dear Mr. Thompson:

This is in response to your letter of April 17, 1998, requesting clarification of the placarding requirements for oxygen under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Specifically you ask whether you may display the identification number for oxygen on an OXYGEN placard in lieu of the text.

The answer is yes. As provided by § 172.334 no person may display an identification number on a RADIOACTIVE, EXPLOSIVES, DANGEROUS or subsidiary hazard placard. It is acceptable to display an OXYGEN placard bearing an identification number on a bulk packaging containing oxygen. The apparent conflict with § 172.519(b)(3), which states that text is required on an OXYGEN placard, will be addressed in a future rulemaking.

I hope this information is helpful.

Sincerely,

Thomas G. Allan
Deputy Director
Office of Hazardous Materials Standards



BOC GASES

BOC Gases
Union Landing & River Roads
P.O. Drawer No. 272
Riverton NJ 08077

Telephones: 609 829 7878

April 17, 1998

Diane DeVille
U.S. Department of Transportation
Research and Specials Programs Administration
Office of Hazardous Materials Safety
Washington, D.C. 20590

Dear: Ms. DeVille

Could you please clarify for BOC Gases the following question.

Are you permitted to placard an liquid oxygen trailer with a yellow placard having a class 2 number in the lower corner, in which you replaced the word "OXYGEN" with the four digit identification number 1073?

Please respond to me at BOC Gases, 600 Union Landing Road, Riverton, NJ, 08077
phone: (609)-786-2906, fax: (609)-786-2959.

Sincerely,

BOC Gases

John N. Thompson
Hazardous Materials Specialist

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