



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

MAR - 4 1993

Mr. Patrick G. Kruger
298 Mendham Road.
Morristown, New Jersey 07960-4805

Dear Mr. Kruger:

This is in response to your letter regarding clarification of the requirements for the display of old and new placards for explosives under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). I apologize for the delay in responding and hope it has not caused any inconvenience.

As provided by § 171.14(b), until October 1, 2001, placards which conform to specifications for placards in effect on September 30, 1991, or placards specified in the December 21 1990 final rule may be used, for highway transportation only, in place of the placards specified in Subpart F of Part 172, in accordance with the "Placard Substitution Table." Therefore, the old or new placards may currently be used for explosives under the described conditions.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

A handwritten signature in cursive script, reading "Delmer F. Billings".

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards

Engnum
File: 172,500, 173,500
SC: 270, 136, 140

US. DEPT. OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS
ADMINISTRATION
OFFICE OF HAZARDOUS MATERIALS
INITIATIVES AND TRAINING (DHM-50)
WASHINGTON, DC 20590 - 0001
26 JUNE 1997

Sirs;

I just taken a NJ Dept of Motor Vehicle Hazmat retest the other day. One of the questions about class 1 explosives was, in essence, A vehicle with 1.1 explosives and 1.5 explosives should be placarded;. The correct answer according to NJ was explosive A.

I have been in the the NJ National Guard for over 22 years and currently working in the ammunition section (artillery). At various ammunition storage areas they all stated that as of September of 1995 the "A,B,C" EXPLOSIVE Placards were superceded and no longer legal for use on public roads. I might ad that these ASA's are run by the US Army not the state of NJ.

This has set up much confusion to me as to what is the proper placard and if the old signs are still ok to use. I have copies of CFR 49 100 -177 200 -399 and read through the sections on placards, drivers, and hazardous materials but could find no reference to the old "A B C" signs except a comparison chart that listed the new divisions compared to the letter divisions. I could not, nor could any one else for that matter, reference the validity of the older signs.

I am concerned that if the new placards are the only ones authorized this question, on NJ's Hazmat test, will send the wrong message to the driver and could result in the improper placard being used, further confusing younger emergency response personnel.

The penalties are pretty severe for violations of hazmat regs. and rightly so. The driver should be given clear and concise instruction in this area. I teach hazmat to personnel in my unit for their hazmat endorsement on their military license. If I can't reference it how can I responsibly teach it ?

I would appreciate if any one in your office could at least point me in the right direction or give me the statute that governs which placards (class 1) are authorized and what the cut off date is (was).

I apologize for any inconvenience this inquiry may have caused and thank you in advance for your assistance. Please send any reply to me at the address below.

sincerely;



Patrick G. Kruger
298 Mendham Rd.
Morristown, N.J.

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