



U.S. Department  
of Transportation

Research and  
Special Programs  
Administration

APR 29 1998

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

Mr. Thomas J. Gilding  
Director, Environmental Affairs  
American Crop Protection Association  
1156 Fifteenth Street, N.W., Suite 400  
Washington, D.C. 20005

Dear Mr. Gilding:

This responds to your letter, dated April 20, 1998, concerning the display of placards on motor vehicles. You asked whether the display of four placards above a vehicle on a single assembly, with one placard visible from the front, one from the rear, and one from each side, would comply with the placarding requirements of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180 ).

The answer to your question is no. When placarding is required by § 172.504 of the HMR, a transport vehicle must be placarded "on each side and each end." The placard holder that you describe in your letter does not meet the requirement in § 172.504 for placarding on each side and each end of a transport vehicle.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Thomas G. Allan

Senior Transportation Regulations Specialist  
Office of Hazardous Materials Standards



Gorsky  
172.516

April 20, 1998

Mr. Thomas Allan  
U.S. Department of Transportation  
Research and Special Programs Administration  
Office of Hazardous Materials Standards  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Mr. Allan:

The American Crop Protection Association (ACPA), in coordination with the Mid-America Crop Protection Association (MACPA), Southern Crop Protection Association (SCPA), and Western Crop Protection Association (WCPA), requests a written interpretation concerning the display of placards on motor vehicles, as specified in 49 CFR 172.504(a) and 172.516(a). We have a prototype of a proposed placard holder that could be used on motor vehicles in the crop protection industry with a Gross Vehicle Weight Rating or a Gross Combination Weight Rating of 26,000 lbs. or less which are not equipped with placard holders.

The proposed placard holder consists of four placard holders mounted to an assembly which is approximately 18" long X 18" wide. This assembly could be mounted on the vehicle in a variety of ways (e.g., with a mounting bracket, which would either be attached to the back of the vehicle's headwall, to the bed, top or side of the vehicle; a spring loaded post extending above the top of the vehicle; or mounted on a luggage or pipe rack). Placards would be readily visible from the front, back, and both sides, as required in 49 CFR 172.516(a).

It is somewhat less clear whether display of placards in the proposed manner would comply with the requirement for vehicles to be "placarded on each side and each end" as specified in 172.504(a). We believe that the proposed method of displaying placards is equivalent to or superior to placement of placards on the ends and sides of vehicles. The placards would be easy to see, actually attracting attention due to their high placement and unique holder. Hazard communication objectives would be clearly accomplished.

For smaller motor vehicles in the agricultural chemicals industry, particularly at the dealer and grower level, it is often difficult to comply with the DOT vehicle placarding requirements. Most pickup trucks do not have placard holders, and self-adhesive or taped placards can damage the paint on the sides of a truck.

Please provide a written interpretation indicating whether or not the display of all four placards above a vehicle on a single assembly, with one placard visible from the front, one from the rear, and one from each side, is in compliance with the 49 CFR 172.504(a) and 172.516(a) placarding requirements.

We appreciate your consideration of this request. If you have any questions, please contact me at (202) 872-3873.

Respectfully submitted,



Thomas J. Gilding  
Director, Environmental Affairs