



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

JAN 16 1998

Mr. Michael Ritchie  
Office of Motor Carrier Services  
Minnesota Department of Transportation  
1110 Centre Pointe Curve  
Mendota Heights, MN 55118

Dear Mr. Ritchie:

This is in response to your letter dated August 7, 1997, requesting clarification of the placarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

- Q1. A truck in interstate commerce is carrying 800 pounds of "Chlorine, 2.3, UN1017", a poisonous gas with subsidiary hazard Class 8 (corrosive), in non-bulk cylinders with no other hazardous material on board. What placard(s) are required?
- A1. Both POISON GAS and CORROSIVE placards are required, as prescribed by § 172.505(a).
- Q2. A truck in interstate commerce carries 1,500 pounds of "Chlorine, 2.3, UN1017," a poisonous gas with subsidiary hazard Class 8 (corrosive), in non-bulk cylinders with no other hazardous material on board. What placard(s) are required? Since the load exceeds 454 kg. has the placarding requirement changed because of the subsidiary hazard?
- A2. The answer is the same as in A1. The fact that the load exceeds 454 kg does not alter the placarding requirement.
- Q3. A truck in interstate commerce carries, in non-bulk packagings, 800 pounds of "Bromine, 8, UN1744, PG I," a poisonous-by-inhalation Hazard Zone A material that is corrosive and has a subsidiary hazard class of Division 6.1 (poisonous material). What placard(s) are required?

A3. Both POISON INHALATION HAZARD and CORROSIVE placards are required, as prescribed by § 172.505(a).

I hope this information is helpful. Should you have further questions, please contact us.

Sincerely,

A handwritten signature in cursive script that reads "Hattie L. Mitchell". The signature is written in black ink and is positioned above the typed name.

Hattie L. Mitchell, Chief  
Exemptions and Regulations Termination  
Office of Hazardous Materials Standards



Minnesota Department of Transportation

Office of Motor Carrier Services  
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Mendota Heights, MN 55118

*BeHo*  
*7/11/172.504*  
*SC: 270, 274*

612/405-6060  
Fax: 612/405-6082  
TDD: 612/405-6072

August 7, 1997

Thomas G. Allen  
Deputy Director  
Office of Hazardous Materials Standards  
US DOT/ RSPA  
400 Seventh St. S.W.  
Washington, D.C. 20590

Re: Request for interpretation of placarding regulations.

49 CFR 172.504 requires placarding of transport vehicles and freight containers carrying hazardous materials. Paragraph (c) of that section gives the exceptions from placarding for loads of less than 454 kg.. Paragraph (c) also states that the "454 kg. exception" does not apply to bulk packagings or hazardous materials subject to section 172.505.

My office has received complaints of inconsistent interpretations and enforcement of the placarding requirements for materials that are designated as poison inhalation hazards by the hazardous materials table and section 172.203(m). The complainant is a Minnesota based interstate carrier of hazardous materials, who reports they have been inspected and found with no defects in one state, and then crossed a state line with the same exact load and placards and have been cited for improper placarding. They have requested immediate assistance and written clarification of the placarding requirements for hazardous materials with primary or subsidiary PIH classifications. They have provided the following examples:

1. A truck in interstate commerce is carrying 800 pounds of "Chlorine, 2.3, UN1017" in non-bulk cylinders. Chlorine has a Class 8 subsidiary hazard. No other hazmat is on the truck. What placard(s) are required?
2. A truck in interstate commerce carries 1500 pounds of "Chlorine, 2.3, UN1017" in non-bulk cylinders. No other hazmat is carried. What placard(s) are required? Since the load exceeds 454 kg. has the placarding requirement changed because of the subsidiary hazard?
3. A truck in interstate commerce carries 800 pounds of "Bromine, 8, UN1744, PG I" in non-bulk packaging. Bromine has a subsidiary hazard of Division 6.1, and is designated a PIH material in hazard zone A by Special provision 1 on the hazardous materials table. No other hazmat is carried. What placard(s) are required?

*2.3, 8*

*2.3, 8*

*8. 6.1*

The carrier reports they transport Chlorine frequently, and they will comply with all placarding requirements. They intend to carry a copy of the RSPA interpretation letter in their trucks.

Thank you for your assistance in this matter. Please send your response to me at the address below, or fax it to me at (612) 405-6082. If you have any questions, my direct telephone is (612) 405-6120 .

Yours truly,

A handwritten signature in cursive script, appearing to read "Michael Ritchie".

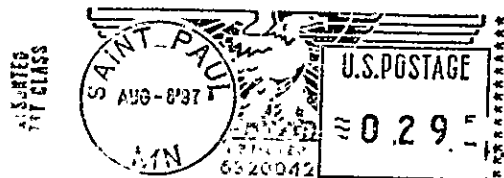
Michael Ritchie  
Hazardous Material Specialist  
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1110 Centre Pointe Curve  
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