



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAY 6 1999

Captain Bruce Bugg
Hazardous Materials Specialist
Georgia Public Service Commission
47 Trinity Avenue, SW
Atlanta, GA 30354-5701

Reference No. 99-0048

Dear Captain Bugg:

This is in response to your letter of February 17, 1999, regarding clarification of §§ 172.504 and 172.516 under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether mounting the front or rear placard on the fenders of cargo tanks, anywhere from even with the front of the cargo tank to as much as 24 inches from the end of the tank satisfies the requirements of §§ 172.504 and/or 172.516.

The answer is no. Section 172.504 states that a transport vehicle must be placarded on each side and each end. A placard located on the tank fender that "faces" the front of the tank is not "on" the front end, and therefore, the placard does not comply with § 172.504. Additionally, the location of the placard does not satisfy the visibility requirements of § 172.516(a).

I hope this answers your inquiry. If we can be of further assistance, please contact us.

Sincerely,

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



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172.504

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February 17, 1999

George
\$172.516
99-0048

Mr. Edward Mazzullo
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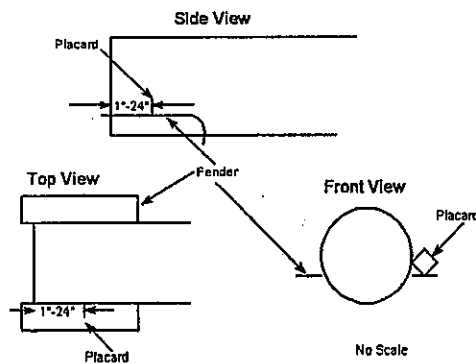
Dear Sir:

This letter is to request a clarification of the visibility and display requirements for placards, especially on cargo tank motor vehicles. As you know, 49 CFR §172.504(a) requires placards be displayed "on each side and each end" of the vehicle. In addition, 49 CFR §172.516 sets down certain other visibility requirements.

Our officers frequently encounter cargo tanks with placards mounted as depicted in the drawings below. The front (and sometimes rear) placards are mounted on the fenders of the tanks, anywhere from even with the front of the cargo tank, to as much as 24 inches from the end of the tank.

We have treated this type of placement as a violation of §172.504, and, depending upon how far back the placard sits, §172.516(c)(2). We feel this is particularly acute in case the cargo tank should roll over onto the side where the placard is mounted, since three of the four placards would then not be readily visible to an approaching person at ground level.

However, we have had numerous carriers question whether this mounting is indeed a violation. Therefore, we request your clarification as to whether these front and/or rear facing placards mounted back from the front edge of the tank surface violate the regulations.



Sincerely,

GEORGIA PUBLIC SERVICE COMMISSION

[Signature]
Capt. Bruce Bugg
Hazardous Materials Specialist