



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

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

JUN - 8 2000

Mr. Kevin Walker
Plant Manager
P.B. & S. Chemical Company, Inc.
395 Swancott Road
Madison, AL 35756-9072

Ref. No. 00-0097

Dear Mr. Walker:

This is in response to your letter dated March 27, 2000, requesting clarification of the provisions in § 172.301(a)(3) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

You provided the following scenario:

A truck is loaded at one location with non-bulk packages containing: 9,000 pounds of Sodium hydroxide, 8, UN1824; 3,400 pounds of Potassium hydroxide, 8, UN1814; 1,200 pounds of Isopropyl alcohol, 3, UN1219; and 4,500 pounds of other non-regulated materials.

Specifically, you ask if the truck must display the appropriate placards and identification number markings or only placards.

The truck in your scenario requires the display of placards only. Section 172.301(a)(3) requires identification number markings on a vehicle containing only a single hazardous material in non-bulk packages that are marked with the same proper shipping name and identification number. This requirement does not apply to the above scenario because the truck is loaded with more than one material.

I hope this satisfies your request.

Sincerely,

John A. Gale
Transportation Regulations Specialists
Office of Hazardous Materials Standards



000097

172.301

P.B. & S. Chemical Company, Inc.

BPH
S172.301
00-0097

March 27, 2000

Mr. Delmer F. Billings, Jr.
Chief, DHM-11, Standards Development
Office of Hazardous Materials Standards
400 7th Street, S.W.
Washington, DC 20590-0001

SUBJECT: Clarification of placarding requirement in PART 172.301(a) 3

Dear Mr. Billings:

As a full line chemical distributor, PB&S Chemical regularly loads multiple hazard classes of products on our local delivery trucks. Internally, there has been some disagreement on the application of the referenced regulation, particularly with the wording, "containing only a single hazardous material in non-bulk packages", as well as note (iv) stating, "contains no other material, hazardous or otherwise;".

Below is a typical example of a daily load of material, all of which would be loaded at our facility for delivery to various customers. My primary concern is the rule's requirements for UN-numbered placards on non-bulk packages when more than one product is on the same truck.

SCENARIO:--truck is loaded with the following freight at one location
9000 lbs of Sodium Hydroxide, 8(Corrosive), UN1824 in non-bulk package(55 gal drums)
3400 lbs of Potassium Hydroxide, 8(Corrosive), UN1824 in non-bulk package
12000 lbs of Isopropyl Alcohol, 3(Flammable liquid), UN1219 in non-bulk package
4500 lbs of various other non-regulated chemicals

UN1814

Should this truck be placarded:

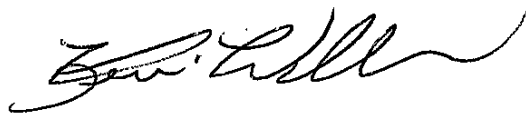
1. Corrosive UN1824, Corrosive, and Flammable UN1219,
OR
2. Corrosive and Flammable (word-only placards)

P.B. & S. Chemical Company, Inc.
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My interpretation of this rule is that option "2" would apply, since there is more than a single hazardous product on board. Furthermore, my understanding of the 4000 kg(8820 lbs) ruling applies only when that is the only product on the truck and total weight, in non-bulk packages exceeds 4000 kg. Your clarification would be greatly appreciated.

Sincerely,



Kevin Walker
Plant Manager