



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

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

AUG - 1 2000

Mr. C.D. Lavender  
S.C. State Police Transport Police  
Hazardous Material Unit  
Department of Public Safety  
800 Dutch Square Boulevard  
Columbia, SC 29210

Ref. No. 00-0192

Dear Mr. Lavender:

This is in response to your letter of July 3, 2000 requesting clarification regarding the placement of a placard on a fender (left - highway side) of a cargo tank motor vehicle. You state that the placard is displayed at approximately a 45 degree angle and is approximately 12 to 18 inches rearward of the front of the cargo tank motor vehicle. You ask if this display is in compliance with the requirements of the Hazardous Materials Regulations (49 CFR 171-180).

The answer to you question is no. As provided by § 172.504(a) "each bulk packaging, ...transport vehicle, or rail car containing any quantity of hazardous materials must be placarded on each side and each end with the placard specified ...." A placard displayed on a fender 12 to 18 inches rearward of the front of the cargo tank motor vehicle does not meet this requirement because there is no placard displayed on the front end of the cargo tank.

I hope this satisfies your inquiry.

Sincerely,

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



000192

172.516

US Department of Transportation  
Research and Special Programs Administration  
400 7<sup>th</sup> St. S.W.  
Washington D.C. 20590

July 3, 2000

Billings  
Edmondson  
§ 172.516 504  
00-0192

Dear Sir,

In the situation of a truck-tractor pulling a cargo tank vehicle, containing a hazardous material which requires marking/placarding. May the front placard/I.D.# be displayed on a fender on the left (highway side) of the cargo tank, at approximately a 45 degree angle, approximately 12 to 18 inches rearward of the front head, instead of being displayed on the actual front of the cargo tank vehicle. Will this method of display meet the visibility/display requirements of 172.516 (a) ?

C.D. Lavender  
S.C. State Transport Police  
Hazardous Material Unit  
Dept. of Public Safety  
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Columbia, S.C. 29210