



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

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

DEC 12 2002

Mr. Ned Williams
General Manager
Gulf States Intermodal
7300 North Peters Street
Arabi, Louisiana 70032

Ref. No. 02-0175

Dear Mr. Williams:

This responds to your letter regarding whether it is permissible to use foreign language text on placards displayed on portable tanks (approximately 6,000 gallons capacity) imported or exported to, or from the United States by water in accordance with the International Maritime Dangerous Goods (IMDG) Code. I apologize for the delay in responding and hope it has not caused any inconvenience.

Text indicating a hazard on a placard, other than the RADIOACTIVE, DANGEROUS, or OXYGEN placards, is not required. When hazardous materials are offered for transportation or transported under the provisions of § 171.12, import/export shipments by water, a placard conforming to the specifications in the IMDG Code may be used in place of a corresponding placard which conforms to the placarding requirements of the HMR, except that a bulk packaging, transport vehicle, or freight container containing a material poisonous by inhalation must be placarded in accordance with subpart F of part 172 of the HMR. Placards conforming to specifications in the IMDG Code may contain foreign language inscriptions or text indicating a hazard (e.g., text displayed in French, Japanese, etc., words). (See §§ 171.12 and 172.519).

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

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



020175

171.12 -
172.519

6-18-2002

Edward T. Mazullo
 Director, Office of Haz - Mat Standards
 U.S. D.O.T. / R.I.S.P.A. (DHM10)
 400 7th St., S.W.
 Washington, D.C. 20590

Engrum
 § 172.502

Placarding
 02-0175



Re: Foreign language wording on hazardous materials placards

Dear Mr. Mazullo,

Gulf States Intermodal (DOT 311230) Division of Boasso America is a transporter of tank containers. Tank containers are considered portable tanks. They have a capacity of approximately 6000 gallons. 97% of the movements that we make are exports to or imports from foreign countries. At least a portion of the movement is made by water whether we pick up or deliver to a railroad or a marine terminal.

The import shipments arrive with placards that are correct as to size, color and hazard class, but many of the placards have wording that is in a foreign language. We see them in French, Spanish, Japanese, etc. Our local Coast Guard office has told P&O Ports, a local terminal operator, that this foreign wording is not allowed. The Coast Guard tells P&O that the wording must be in English and that the terminal or the carrier must change them.

Gulf States Intermodal contends that item 172.519 of the Hazardous Materials Regulations covers this placarding issue. This paragraph allows that certain hazardous materials shipments can be transported under rules set forth in the I.M.D.G. We contend that Part 5 of the I.M.D.G. allows for any language in the placard as long as the size, color and hazard class requirements are met. We agree that the tank, in these circumstances, must also have an orange panel with the U.N. number on both sides, the back and the front. The proper shipping name must be stenciled on both sides in 2 " letters.

I am requesting an opinion, in writing, from your office regarding this matter. Should you agree with our interpretation, then we can stop the unnecessary replacarding of tanks at the New Orleans port facilities.

Boasso America Corporation
 7300 North Peters Street
 Arabi, LA 70032

Tel: (504)279-6544
 Fax: (504)277-0113
 www.boassoamerica.com

ISO 9002
 Certificate Number: 31089

A portion of these tanks are unloaded and returned, with residue, back to the wharf for subsequent shipment back to the original point of loading. We would also like to know if the original placarding can remain on the tank or if the placarding has to be changed to no wording or to English for the return movement?

We eagerly await your reply.

Respectfully,

Ned Williams
General Manager
Gulf States Intermodal
7300 N. Peters
Arabi, La. 70032