



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

JUL 23 2014

Mr. Marcus Kofoot  
Midwest Meter, Inc.  
P.O. Box 376  
Hampton, IA 50441

RefNo.: 14-0087

Dear Mr. Kofoot:

This is a response to your April 25, 2014 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) with regard to placard specifications. Specifically, you request clarification on whether a placard may have a white ½ inch border instead of a solid line inner border.

In your email you provide examples of your placard design. Provided the placard, including the dimensions of the inner and outer borders conforms to the specifications in § 172.519(c), a white inner border is acceptable. In the example you provide, the inner border is a solid line. As stated in § 172.519(d)(4), the placard color must extend to the inner border and may extend to the edge of the placard in the area designated on each placard except the color on the CORROSIVE and RADIOACTIVE placards (black and yellow, respectively) must extend only to the inner border.

I hope this information is helpful. If you have any more questions, please do not hesitate to contact this office.

Sincerely,

Robert Benedict  
Chief, Standards Development  
Standards and Rulemaking Division

Suchak  
3172.519

Drakeford, Carolyn (PHMSA)

**From:** INFOCNTR (PHMSA)  
**Sent:** Monday, April 28, 2014 12:03 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Hazardous Placard Regulation Inquiry

Placarding  
14-0087

Hi Carolyn,

This caller requested we submit this e-mail as a formal letter of interpretation.

Thanks,

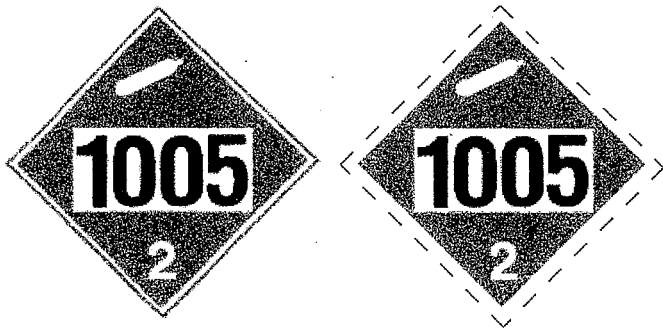
Victoria

**From:** Marcus Kofoot - Midwest Meter Inc. [<mailto:mkofoot@midcomcorp.com>]  
**Sent:** Friday, April 25, 2014 5:27 PM  
**To:** INFOCNTR (PHMSA)  
**Subject:** Hazardous Placard Regulation Inquiry

Attn. office of the Department Of Transportation, Washington D.C.,

I am writing in regards to CFR § 172.519 (c) and CFR § 172.519 (d)(4) the regulations regarding the border of hazardous materials transportation placards. The code states in section (c) that the placard "must have a solid line inner border approximately 12.7 mm (0.5 inches) from edge" as it appears in my first example below. I have placards that look like my second example. Every dimension is exactly the same but the ½" border surrounding the placard is white. Is this admissible, in relation to section (4) which states "The placard color must extend to the inner border and may extend to the edge of the placard"?

Thank you for your consideration,



Best regards,

Marcus Kofoot  
Midwest Meter, Inc.  
P.O. Box 376  
Hampton, IA 50441  
Phone: 641-456-5205  
Fax: 641-456-4600