



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

JAN 12 2016

Mr. Albert R. Vandaveer
Haliburton HRD
4375 S. Loop 1604 E.
Elmendorf, TX 78114

Reference No. 16-0166

Dear Mr. Vandaveer:

This letter is in response to your October 12, 2016, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to placarding. You describe in your letter a scenario where a pickup truck with a trailer attached contains an amount of hazardous materials that requires placarding. Specifically, you ask whether the front of the pickup truck may be placarded to satisfy the front placard requirement prescribed in § 172.504(a).

The answer is yes. Except as otherwise provided by the HMR, each bulk packaging must be placarded on each side and each end with the type of placards specified in Tables 1 and 2 of § 172.504(e). However, as authorized in § 172.516(b), the required placarding of the front of a motor vehicle may be on the front of a truck-tractor instead of or in addition to the placarding on the front of the cargo body to which a truck-tractor is attached. Therefore, the placarding scenario you describe in your letter is authorized by the HMR.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Stevens
§ 172.516(b)
Placarding
16-0166

Dodd, Alice (PHMSA)

From: Rivera, Jordan CTR (PHMSA)
Sent: Wednesday, October 12, 2016 3:51 PM
To: Hazmat Interps
Subject: FW: Request for clarification
Attachments: Signed PHMSA request.pdf

Hi Shante/Alice,

Please submit this as a letter of interpretation. I spoke with Mr. Vandeaver.

Please let me know if you have any questions.

Thanks,
Jordan

From: Albert Vandeaver [<mailto:Albert.Vandeaver@halliburton.com>]
Sent: Wednesday, October 12, 2016 3:42 PM
To: INFOCNTR (PHMSA)
Cc: Albert Vandeaver
Subject: Request for clarification

See attachment regarding clarification of placarding regulation.

Thanks,
Albert R. Vandeaver
Halliburton HRD
Office # 210-621-1815
Mobile # 210-400-9948

This e-mail, including any attached files, may contain confidential and privileged information for the sole use of the intended recipient. Any review, use, distribution, or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive information for the intended recipient), please contact the sender by reply e-mail and delete all copies of this message.

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

To U.S. DOT:

This is in regards to a question of placard placement on a pickup/trailer combination. The pickup is attached to a trailer that is carrying hazardous materials (placardable amount), and the driver places the placard on the front of the pickup, as opposed to the front of the trailer. The other three sides of the trailer are appropriately placarded. From my take on 172.516(b), the regulation specifically addresses a placard may be placed "on the front of the cargo body to which a truck-tractor is attached."

An assistance you may provide in clarification would be greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert R. Vandavear", with a stylized flourish at the end.

Albert R. Vandavear