



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

MAY 25 2017

David Vargyas
Safety Director
R&R Trucking, AATCO, NEI
302 Thunder Road
Duenweg, MO 46841

Reference No. 17-0034

Dear Mr. Vargyas:

This letter is in response to your March 31, 2017, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the display of placards in accordance with § 172.516(c)(5). Specifically, you ask what constitutes the text or identification number on a placard to no longer be displayed horizontally. You also provide examples of a variety of placards and ask if they are in compliance with § 172.516(c)(5).

The answer is yes. The examples you provided meet the intent of § 172.516(c)(5). Section 172.516(c)(5) requires that each placard on a transport vehicle, bulk packaging, freight container or aircraft unit load device have the authorized hazard class name or identification number displayed horizontally, reading from left to right. With respect to what constitutes "horizontal," in the absence of defining criteria in the HMR we rely on a standard dictionary definition, which defines horizontal as "parallel to, in the plane of, or operating in a plane parallel to the horizon or to a baseline." Based on this definition, it is the opinion of this Office that the placard text or identification numbers are displayed in a horizontal manner so that they can be read from left to right.

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

Sincerely,

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Goodall, Shante CTR (PHMSA)

Geller
172.516
Visibility and display placards
17-0034

From: INFOCNTR (PHMSA)
Sent: Monday, April 03, 2017 2:36 PM
To: Hazmat Interps
Subject: FW: Letter of Interpretation 3-31-17
Attachments: Placard-2.pdf; Placard-3.pdf

Hi Shante/Alice,

Please submit this as a letter of interpretation. Please let me know if you have any questions.

Thanks,
Jordan

From: David Vargyas [mailto:David.Vargyas@randrtruck.com]
Sent: Friday, March 31, 2017 9:59 AM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>; David Vargyas <David.Vargyas@randrtruck.com>
Subject: Letter of Interpretation 3-31-17

U.S. DOT
PHMSA Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

March 31, 2017

To Whom It May Concern:

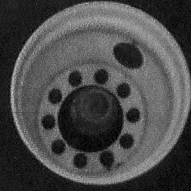
I am requesting a Letter of Interpretation regarding PHMCSA Sec. 172.516(c)(5). At what point would placards be considered no longer horizontal and no longer in compliance? I have attached pictures of placards on a trailer. I am specifically interested to know if the two placards labeled 1223 and 1325 are compliant.

Your guidance is appreciated.

David Vargyas
Safety Director
R&R Trucking, AATCO, NEI
P: 417-623-6885, x2130

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