



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

1200 New Jersey Ave, S.E.  
Washington, D.C. 20590

**JAN 27 2010**

Mr. Chithambarathanu Pillai  
Carus Corporation  
1500 Eighth Street  
La Salle, IL 61201

Ref. No.: 09-0171

Dear Mr. Pillai:

This responds to your July 29, 2009 letter regarding the placarding and marking requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Please accept my apology for our delay in responding and any inconvenience it may have caused. Your questions are summarized and answered below.

Q1. A closed transport vehicle contains multiple bulk packages (tote bins) of UN 1490, 5.1, Potassium permanganate and UN 3214, 5.1, Permanganates, inorganic, aqueous solution, n.o.s. Is it permissible to affix the OXIDIZER placard along with orange identification number panels displaying "1490" and "3214"? Also, is it permissible to affix the OXIDIZER placard with the ID number 3214 and a separate OXIDIZER placard with ID number 1490 instead?

A1. Yes. The vehicle must be placarded when transporting a bulk package as required by § 172.504(a) and must display an ID number on all four sides as required by §172.302(a). The transport vehicle may be marked and placarded with four OXIDIZER placards displaying the ID numbers "1490" and "3214" or four orange panels displaying the ID numbers "1490" and "3214" and four OXIDIZER placards.

Q2. A truck is loaded with one (bulk package) tote bin containing UN 1490, 5.1, Potassium permanganate and 10,000 pounds of UN 3214, 5.1, Permanganates, inorganic, aqueous solution, n.o.s in non-bulk packages. What placarding and ID number markings are required?

A2. The bulk package containing the potassium permanganate, UN 1490, must be marked and placarded as discussed in answer A1 above. A vehicle transporting 10,000 pounds of permanganates, inorganic, aqueous solution, n.o.s., UN 3214, in non-bulk packages must display OXIDIZER placards in accordance with §172.504. In addition, if 8,820 pounds or more of the permanganates, inorganic, aqueous solution, n.o.s, is loaded at a single loading facility, the transport vehicle must be marked on each side and each end as specified in § 172.301(a)(3). See §§ 172.332 and 172.336.

Q3. A truck is loaded with one bulk package (tote bin) containing UN 3214, 5.1, Permanganates, inorganic, aqueous solution, n.o.s. and 10,000 pounds of UN 1490, 5.1 Potassium permanganate. What placarding and ID number markings are required?

A3. The bulk package containing permanganates, inorganic, aqueous solution, n.o.s., UN 3214, must be marked and placarded as discussed in answer A1 above. A vehicle transporting 10,000 pounds of potassium permanganate, UN 1490, in non-bulk packages must display OXIDIZER placards in accordance §172.504. In addition, if 8,820 pounds or more of the potassium permanganate is loaded at a single loading facility, the transport vehicle must be marked on each side and each end as specified in § 172.301(a)(3). See §§ 172.332 and 172.336.

Q4. A truck is loaded with one (bulk package) tote bin containing UN 1490, 5.1 Potassium permanganate and 2,000 pounds of UN 3214, 5.1, Permanganates, inorganic, aqueous solution, n.o.s. What placarding and ID number markings are required?

A4: The bulk package containing potassium permanganate, UN 1490, must be marked and placarded as discussed in answer A1 above. A vehicle transporting 2,000 pounds of permanganates, inorganic, aqueous solution, n.o.s., UN 3214, in non-bulk packages must display OXIDIZER placards in accordance §172.504. ID number marking is not required for non-bulk shipments of permanganates, inorganic, aqueous solution, n.o.s., UN 3214, under 8,820 pounds. See §172.301(a)(3).

Q5. A truck is loaded with one (bulk package) tote bin of UN 3214, 5.1, Permanganates, inorganic, aqueous solution, n.o.s. and 2,000 pounds of UN 1490, 5.1 Potassium permanganate. What placarding and ID number markings are required?

A5: The bulk package containing permanganates, inorganic, aqueous solution, n.o.s., UN 3214, must be marked and placarded as discussed in answer A1 above. A vehicle transporting 2,000 pounds of potassium permanganate, UN 1490, in non-bulk packages must display OXIDIZER placards in accordance §172.504. ID number marking is not required for non-bulk shipments of potassium permanganate, UN 1490, under 8,820 pounds. See § 172.301(a)(3).

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,



Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards

§ 172.101

§ 172.302

Applicability/Marking

09-0171

**Drakeford, Carolyn (PHMSA)**

**From:** Lehman, Victoria (PHMSA)  
**Sent:** Thursday, July 30, 2009 9:47 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** RE Hazmat Center Inquiry

-----Original Message-----

From: PHMSA-Feedback [mailto:PHMSA-Feedback]  
Sent: Wednesday, July 29, 2009 5:40 PM  
To: PHMSA HM InfoCenter; PHMSA Webmaster  
Subject: Hazmat Information Center Feedback: Other Questions?

We request a formal answer under PHMSA Interpretations as guidance document.

July 29, 2009

We would appreciate your answers to these questions.

1. Are two identification number markings required to be displayed on a closed transport vehicle containing multiple bulk packages? Specifically, in a scenario where multiple tote bins (bulk packages) of two different hazardous materials with ID # 1490 and 3214 are loaded. Could you confirm that it is permissible to affix the oxidizer 5.1 placard, the orange ID panel 1490 and the orange panel 3214? Is it also permissible to affix oxidizer 5.1 placard displayed with the ID number 1490 and another oxidizer 5.1 placard displayed with the ID number 3214 instead?
2. If the truck is loaded with one tote bin (bulk package) of hazardous material with ID # 1490 and 10,000 lbs of a different single hazardous material with ID # 3214, what placarding and identification # markings are required?
3. If the truck is loaded with one tote bin (bulk package) of hazardous material with ID # 3214 and 10,000 lbs of a different single hazardous material with ID # 1490, what placarding and identification # markings are required?
4. If the truck is loaded with one tote bin (bulk package) of hazardous material with ID # 1490 and 2,000 lbs of a different single hazardous material with ID # 3214, what placarding and identification # markings are required?
5. If the truck is loaded with one tote bin (bulk package) of hazardous material with ID # 3214 and 2,000 lbs of a different single hazardous material with ID # 1490, what placarding and identification # markings are required?

-----  
 Name: Chithambarathanu Pillai  
 Organization: Carus Corporation  
 Email: chithambarathanu.pillai@caruscorporation.com  
 Address: 1500 Eighth Street  
 City: LaSalle  
 Zip Code: 61301  
 Phone: 815-224-6863  
 FAX: 815-224-6816