



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

OCT 01 2009

Mr. Paul J. Dambek
Hazmat, Inc.
12 Kimball Hill Road
Hudson, NH 03051-3915

Ref. No.: 09-0201

Dear Mr. Dambek:

This responds to your August 14, 2009 letter requesting clarification of the placarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered below.

Q1. A shipper offers for transportation two cylinders of Chlorine, UN1017, 2.3 (5.1, 8). The gross weight of this shipment is 800 pounds. Must the vehicle be placarded with the poison gas, oxidizer, and corrosive placards?

A1. No. The required placard for "UN1017, Chlorine, 2.3" is the POISON GAS placard. See § 172.504(e), Table 1. Placarding for the subsidiary 5.1 and 8 hazards is not required, but is permissible as specified in § 172.505. The HMR do not specify how to display the primary and subsidiary placards in relation to each other; however, each placard must be clearly visible from the direction it faces.

Q2. A shipper offers for transportation two cylinders containing residual amounts of Chlorine, UN1017, 2.3 (5.1, 8). Is the shipment required to be placarded?

A2. Yes. As specified in § 173.29, empty packagings containing the residue of a hazardous material must be offered and transported in the same manner as when they previously contained a greater quantity of the hazardous material unless the packagings are sufficiently cleaned of residue and purged of vapors to remove any potential hazard, or are refilled with a material that is not subject to the HMR.

Q3. A shipper offers for transportation a drum of Chlorosulfonic acid, UN1754, 8 (6.1), PG I for transportation by highway. The gross weight of the material is 450 pounds. Is the shipment required to be placarded?

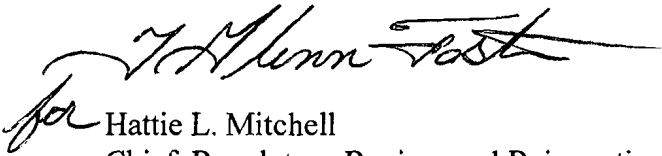
A3. Yes. In accordance with § 172.505(a), a poisonous material subject to the "Poison Inhalation Hazard" shipping description requirements in § 172.203(m) must be placarded with a POISON INHALATION HAZARD or POISON GAS placard. Chlorosulfonic acid meets

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the definition for a material that is poisonous by inhalation (see Special Provision 2 as indicated in Column 7 for the entry for Chlorosulfonic acid in the Hazardous Materials Table in § 172.101) and, therefore, is subject to the shipping description requirements in § 172.203(m) and the placarding requirements in § 172.505(a).

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

Sincerely,

A handwritten signature in black ink, appearing to read "Hattie L. Mitchell". The signature is written in a cursive style with a long horizontal flourish extending to the right.

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



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Andrews
3172.505
Placarding
09-0201

August 14, 2009

Office of Hazardous Materials Standards
Pipeline and Hazardous Materials Safety Administration
ATTN: PHH-10
U.S. Department of Transportation
400 7th Street
Washington, D.C. 20590

Dear Sirs:

I have a question concerning the applicability 49 CFR 172.505, subsidiary placarding. Consider the following scenarios:

- #1) A shipper offers for transportation two cylinders of chlorine gas (UN 1017, Chlorine, 2.3 (5.1, 8)) on one truck. The aggregate gross weight of this shipment is 800 pounds. Must the vehicle be placarded with the poison gas AND oxidizer & corrosive placards?
- #2) Consider scenario #1 above, but the cylinders only have residual amounts of gas in the cylinders. Which placards must be affixed to the truck?
- #3) One drum of UN 1754, Chlorosulfonic acid, 8 (6.1), PG I is offered for transportation on a truck. Chlorosulfonic acid is a PIH, Zone B chemical. The gross weight of the drum is 450 pounds. Which placards must be affixed to the truck?

Your assistance is greatly appreciated.

Sincerely,

Paul J. Dambek