



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

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

OCT 28 2010

Mr. Michael Ritchie
Hazardous Materials Specialist
Minnesota Department of Transportation
Commercial Vehicle Operations Section
395 John Ireland Boulevard
St. Paul, MN 55155

Ref. No.: 10-0126

Dear Mr. Ritchie:

This responds to your letter regarding placarding and marking of cargo tank motor vehicles in accordance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You asked whether the required placards and markings, including the proper shipping name or common name and the INHALATION HAZARD marking, must be displayed directly on the cargo tank, or may the markings and placards be displayed on the "vehicle equipment boxes" or other appurtenances, as shown in the enclosed photographs of cargo tank motor vehicles in Liquefied Petroleum Gas (LPG) and Anhydrous Ammonia service, as long as the placards and markings are clearly visible.

A cargo tank meets the definition of a bulk packaging and must be placarded on each side and each end. Section 172.516 states that each placard on a motor vehicle must be readily visible from the direction it faces except from the direction of another transport vehicle to which the motor vehicle is coupled. Generally, placards on the sides and ends of the cargo-carrying portion of a vehicle's cargo body satisfy requirements for placarding the sides and ends, as long as they are readily visible and not obscured by appurtenances in the direction they face.

It is the opinion of this Office that a cargo tank motor vehicle placarded and marked with an identification number display, including the proper shipping name or common name and the INHALATION HAZARD marking, as depicted in your photographs, complies with the requirements in §172.516 for visibility and display.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

Ben Supko
Acting Chief, Standards Development
Office of Hazardous Materials Standards



Minnesota Department of Transportation

Office of Freight and Commercial Vehicle Operations

395 John Ireland Blvd.
St. Paul, MN 55155-1899

June 7, 2010

Charles E. Betts
Chief, Standards Development
Office of Hazardous Material Standards
USDOT/PHMSA
1200 New Jersey Avenue, SE
Washington, DC 20590

Engrum
§ 172.313
§ 172.328
§ 172.504
Marking/Placarding
10-0126

Re: Placarding and marking of cargo tank motor vehicles

Dear Mr. Betts,

The Federal hazardous material regulations require placarding and marking of both bulk hazmat packages and vehicles transporting hazardous materials. 49 CFR 172.504 requires placarding of each bulk packaging and transport vehicle, unless excepted. Section 172.514 requires each person offering a bulk packaging containing hazardous material to affix the placards specified for that material to the bulk packaging. Section 172.328 requires cargo tanks transporting Class 2 compressed gases to display the proper shipping name or common name of the material, and its ID number. Section 172.313 requires bulk packaging containing materials poisonous by inhalation to be marked INHALATION HAZARD on two opposing sides.

Enclosed are photographs of two cargo tank motor vehicles. One is in propane service, the other in anhydrous ammonia service. Both display placards and markings on the equipment boxes attached to the vehicles, not on the bulk packaging itself. The placards and markings are clearly visible from the direction they face.

Question: On a cargo tank motor vehicle in LPG or anhydrous ammonia service, must the required placarding and marking be displayed on the bulk packaging (the cargo tank) or may the required placards and marks, including the shipping name and the INHALATION HAZARD marking, when appropriate, be displayed on vehicle equipment boxes or other appurtenances, as long as those marks and placards are clearly visible?

Yours truly,

Michael Ritchie
Hazardous Materials Specialist
Minnesota Department of Transportation
Commercial Vehicle Operations Section
395 John Ireland Boulevard
St. Paul, MN 55155
(651) 366-3697



CENEX
LAND O LAKES



NOT
REFRIGERANT

Cenex Petroleum
Division of Perham
Co-op Creamery
Perham, MN
Ph. 346-3500







