



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JUL 26 2011

Ms. Laura Grove
Trucking – R & L
600 Gilliam Road
Wilmington, Ohio 45177

Ref. No.: 10-0247

Dear Ms. Grove:

This responds to your e-mail regarding the requirements for display of markings, labels, or placards on shipments of hazardous materials (liquids) in accordance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your company has implemented a program that uses an insulating blanket to reduce the risk of hazardous materials freezing. Specifically, you ask if the markings, labels, or placards on the packaging need to be transferred to the outside of the blanket.

The answer is yes. In accordance with Part 172 of the HMR, markings (§172.304), labels (§172.406) and placards (§172.516) must be unobscured and visible. For a bulk packaging contained in or on a transport vehicle or freight container, if the identification number marking on the bulk packaging is not visible, the transport vehicle or freight container must be marked on each side and each end as specified by § 172.332 with the identification number marking.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Supko".

Ben Supko
Chief, Standards Development Branch
Standards and Rulemaking Division

Engrum
§172.101

Applicability
10-0247

Drakeford, Carolyn (PHMSA)

From: Lehman, Victoria (PHMSA)
Sent: Monday, November 22, 2010 12:32 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Hazmat Information Center Feedback: Interpretations (Letters) Issued by PHMSA

Hi Carolyn,

We received the following request for a formal letter of interpretation at the Info Center.

Thanks,

Victoria Lehman
202-366-1035

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

From: PHMSA-Feedback [mailto:PHMSA-Feedback]
Sent: Friday, November 19, 2010 10:09 AM
To: PHMSA HM InfoCenter; PHMSA Webmaster
Subject: Hazmat Information Center Feedback: Interpretations (Letters) Issued by PHMSA

I wrote this morning to the Information Center and received a call back from Neil who did not clearly answer my question and the voicemail stated I could call the 800 number. I then did so and spoke with Dirk at 1-800-467-4922, who could not provide me with an interpretation.

My question is:

During this time of year we implement a program to reduce the risk of freezable liquids of hazardous materials/ products during transportation by commercial motor vehicle (tractor/trailer).

Our question is:

Do the markings and labels, placards (bulk shipment), need to be transferred to the outside of the blanket?

The blanket is closed on 3 sides and Velcro strapped on one side. If an official requested us to remove the blanket so they could visually see that the shipping papers match the shipment, in most cases this would be difficult - because our trailers are full from the nose to the rear and there is not any room to move freight around to be able to allow a driver to climb into the nose of the trailer and remove the blanket for the official to view the freight.

It was my understanding from Dirk that we do not need to transfer the markings and labels as long as the blanket can be easily removed upon an officials request and as long as the trailer was properly placarded and we must have shipping papers to document what is being transported.

After speaking with our operation we would not always be able to comply with the officials request to remove the blanket. It would depend on the load configuration.

We need some clarification on this subject to ensure we are in compliance at all times with the regulations. Please respond in writing to this request.

Name: Laura Grove
Organization: Trucking - R + L

Email: lgrove@rlcarriers.com
Address: 600 Gillam Road
City: Wilmington
Zip Code: 45177
Phone: 800-543-5589, 1164
FAX: 937-655-5871