



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JUN 09 2011

Ms. Lisa Taylor
RSLP, TASC Inc.
Hill AFB, B1267 West Side, UT

Reference No. 11-0032

Dear Ms. Taylor,

This is in response to your e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the display of identification numbers on Class 1 (explosive) placards. Specifically, you request confirmation of your understanding that motor vehicles may not display identification numbers on placards with for Division 1.1 and 1.3 (explosive) materials.

The limitations pertaining to the display of identification numbers (see § 172.503) on placards are set forth in § 172.334. Section 172.334(a) prohibits the display of an identification number on certain placards, including EXPLOSIVES 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6 placards. However, as specified in § 172.336(b), for materials in hazard classes for which placards are specified and identification number displays are required, but for which identification numbers may not be displayed on the placards authorized for the material, identification numbers must be displayed on orange panels or on the plain white square-on-point display configuration in association with the required placards. An identification number displayed on a white square-on-point display configuration is not considered to be a placard.

I hope this information is helpful. Please contact this Office should you need additional assistance.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Drakeford, Carolyn (PHMSA)

McIntyre
§ 172.334
§ 172.101

From: INFOCNTR (PHMSA)
Sent: Monday, February 07, 2011 2:16 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Hazmat Information Center Feedback: Interpretations (Letters) Issued by PHMSA

Explosives
11-0032

Hi Carolyn,

We received the following request for a letter of interpretation. This request is almost identical to the other request from Lisa Taylor I just sent you.

Thanks,

Victoria Lehman
Hazmat Information Center (HMIC)
Pipeline & Hazardous Materials Safety Administration 1200 New Jersey Avenue, SE, E21-119
Washington, D.C. 20590 <http://phmsa.dot.gov/hazmat/info-center>
(202) 366-1035

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

From: PHMSA-Feedback [mailto:PHMSA-Feedback]
Sent: Friday, February 04, 2011 4:17 PM
To: PHMSA HM InfoCenter; PHMSA Webmaster
Subject: Hazmat Information Center Feedback: Interpretations (Letters) Issued by PHMSA

Request a formal letter of interpretation for placarding of Class 1 explosives. The 309 MMXG transportation office at Hill AFB has required our program office to procure and provide them technical directions in writing for placing the UN identification number on all tractor trailer shipments of rocket motors being shipped from this base to the wings and launch sites. We have tried to explain to them that it is a violation of Title 49 CFR 172.334(a) to place the UN ID number on the motor vehicle, yet they still insist and have placarded all trailers with a UN ID number and continue to ship this way. We as the customer have told them the only placard required for our shipments is a 1.1 or 1.3 explosive placard on all four sides. We are not going to procure or provide instructions for using UN ID numbers on the tractor trailer shipments of Class 1 rocket motors. Request a letter from your office with the interpretation. Very respectfully, Lisa Taylor

Name: Lisa Taylor
Organization: USAF AFSPC/SDTG/LTS
Email: Lisa.Taylor.ctr@hill.af.mil
Address: 6035 Dogwood Ave, Bldg 1267 West Side
City: Hill AFB
Zip Code: 84056
Phone: 801-777-1922

McIntyre
§ 172.334
§ 172.101

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Monday, February 07, 2011 2:14 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Placarding Requirements for Class 1 Explosives

Explosives
11-0032

Hi Carolyn,

We received the following request for a formal letter of interpretation at the Info Center. The requestor previously spoke with Adam Lucas and Andrew Eckenrode at the Info Center.

Thanks,

Victoria Lehman
Hazmat Information Center (HMIC)
Pipeline & Hazardous Materials Safety Administration 1200 New Jersey Avenue, SE, E21-119
Washington, D.C. 20590 <http://phmsa.dot.gov/hazmat/info-center>
(202) 366-1035

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

From: Taylor, Lisa R CTR USAF AFSPC SDTG/LTS [<mailto:Lisa.Taylor.CTR@Hill.af.mil>]
Sent: Friday, February 04, 2011 3:58 PM
To: INFOCNTR (PHMSA)
Subject: FW: Placarding Requirements for Class 1 Explosives

Request a formal letter of interpretation for placarding of Class 1 explosives. The 309 MMXG transportation office at Hill AFB has required our program office to procure and provide them technical directions in writing for placing the UN identification number on all tractor trailer shipments of rocket motors being shipped off this base to the wings or launch sites. We have tried to make them understand that it is a violation of Title 49 CFR to place the UN ID number on the motor vehicle, yet they still insist and have placarded all trailers with a UN ID number and continue to ship this way. We as the customer have told them the only placard required for our shipments is a 1.1 or 1.3 explosive placard on all 4 sides. We are not going to procure or provide instructions for using UN ID Numbers on their tractor trailers.

After inquiries to the DOD Ammunition Control Point and the DOT HMIS information center, we remain clear as the customer that the 309 MMXG transportation office is in direct violation of Title 49 CFR 172.334(a).

Request a letter from your office stating as such.

Very respectfully,

Lisa Taylor

Lisa Taylor

RSLP, TASC Inc.

Hill AFB, UT B1267 West Side

Office: (801) 777-1922

Cell: (801) 710-5619

Lisa.Taylor.ctr@hill.af.mil