



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

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

**APR 18 2011**

Mr. Roger W. Cooper  
8412 Dutch Bethel Road  
Freedom, In. 47431

Reference No.: 11-0078

Dear Mr. Cooper:

This responds to your March 30, 2011 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to marking requirements. Specifically, you state in your letter that you have designed an orange panel holder to protect orange panels from damage. You ask whether your orange panel holder is permissible under the HMR so that you may produce this item for commercial sale.

This Office does not provide approval for commercial products. However, provided the orange panel itself meets the identification number marking requirements specified in § 172.332(b), and the orange panel holder does not prevent the marking from meeting the visibility requirements specified in § 172.304, the orange panel holder would be permitted to be used under the HMR.

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

Sincerely,

A handwritten signature in cursive script that reads "T. Glenn Foster".

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

Benedict,  
§ 172. Appendix C  
§ 172. 516 (7)(d)  
Placarding  
11-0079

March 30, 2011

Mr. Kurt Eichenlaub  
Office of Hazardous Materials Standards  
Pipeline and Hazardous Materials Safety Administration  
US Department of Transportation  
400 Seventh St, SW  
Washington, DC 20590-0001  
[kurt.eichenlaub@dot.gov](mailto:kurt.eichenlaub@dot.gov)

Re: New Design Example #2

Mr. Eichenlaub,

We also talked about a new placard holder for the orange panel type placards. There is no holder for these, they "peel and stick". However, they do not stick if the trailers are dirty, cold or wet. This results in the same problem we are having with the placards that do have holders. They fly off.

What I came up with is a similar design as the original placard holder taking out the center supports and changing the frame size to 16 7/8" wide and 10" high, riveting a clear acrylic sheet to the back of the front of the frame and 2 retainer clips at the top to secure the placard. If the acrylic sheet cracks or needs to be replaced, simply drill out the rivets and replace. The acrylic can be coated with an anti-fog agent as well as an anti-scratch agent.

Dimension size for the Orange Panel Placard Holder

Acrylic .080" thick 15 3/4" wide X 6 3/4" high

Frame made of .025" thick aluminum 16 7/8" wide X 7 1/2" high

Backmount plate .025" thick aluminum 16 7/8" wide X 10" high

Four 1/8" X 1/8" aluminum rivets to hold acrylic to frame

Seven 3/16" X 1/8" aluminum rivets to hold frame to back mount plate

Two snap retainer clips

Attached are pictures of the prototype for this design.

What I am asking for is a letter of approval so I can go forward with these projects.

If you need more information or specifications, please feel free to contact me by e-mail [sheilacooper@hughes.net](mailto:sheilacooper@hughes.net) or my cell number 317-372-4472.

Respectfully,

Roger W. Cooper  
8412 Dutch Bethel Road  
Freedom, Indiana 47431  
317-372-4472 cell

## Product Duraplex Impact Modified Acrylic

- Thickness .080"
- 100 times stronger than glass
- International Code Council Evaluation Service (ICC-ES) listings incorporate former ICBO, SBCCI, BOCA and NES certifications) as CC2 plastics
- ANSIZ79.1 Safety Glazing Requirements
- ANSIZ26.1 Motor Vehicle Safety Standards
- Underwriters Laboratories (UL) listing as UL94HB
- Miami-Dade County Product Control Notice of Acceptance clear plastic
- 10 year limited warranty on all clear acrylic against yellowing
- ASTM D – 4802B-1 Plastic

Holder Frame plain .025 gauge aluminum

1/8" X 1/8" and 3/16" X 1/8" aluminum rivets

Back mount plate .025 gauge aluminum