



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JUN 9 2011

Mr. Thomas Gerhold
Safety Manager
New Penn Motor Express
625 S. 5th Avenue
Lebanon, PA 17042-0630

Ref. No.: 11-0100

Dear Mr. Gerhold:

This responds to your April 13, 2011 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the display and visibility of placards. In your letter, you provide a picture of a straight truck with placard holders in place on the sides and ends of the cargo body. Specifically, you ask if placards placed in the placard holders in front of the cargo body but behind the passenger compartment of the truck would satisfy the placard visibility requirements of the HMR.

The answer is no. Section 172.516(a) states that each placard on a motor vehicle must be clearly visible from the direction it faces, except from the direction of another transport vehicle to which the motor vehicle is coupled. For purposes of the HMR, a "transport vehicle" is a cargo-carrying vehicle such as an automobile, van, tractor, truck, semi-trailer, tank car or rail car used for the transportation of cargo by any mode. In this case, the cargo carrying portion of the motor vehicle is not "another transport vehicle," because it is part of a single transport vehicle (straight truck). The picture provided in your letter illustrates that the placard on the front of the cargo body of the straight truck is not visible from the front of the transport vehicle because it is clearly obstructed from view by the passenger compartment. A placard placed on the front bumper or similar location in accordance with § 172.516(b) would satisfy the visibility requirement of § 172.516(a).

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

Sincerely,

Ben Supko
Chief, Standards Development Branch
Standards and Rulemaking Division



Date: 04/13/2011

Eichenlaub
§ 172.516(a)
Placarding
11-0000

625 South Fifth Avenue
Lebanon, PA 17042
Phone: 800.285.5000
Fax: 717.274.5593
newpenn.com

TO: Mr. Charles E. Betts

FROM: Thomas Gerhold

Subject: HMR; 49CFR 172.516,(a)

Dear Mr. Betts

We are writing you today to request clarification of the requirements under the Hazardous Materials Regulations (HMR; 49 CFR Part 172.516 (a)) Applicable to the visibility and display of placards. Accompanying this letter are pictures of our Sterling Straight Truck.

Our question is;

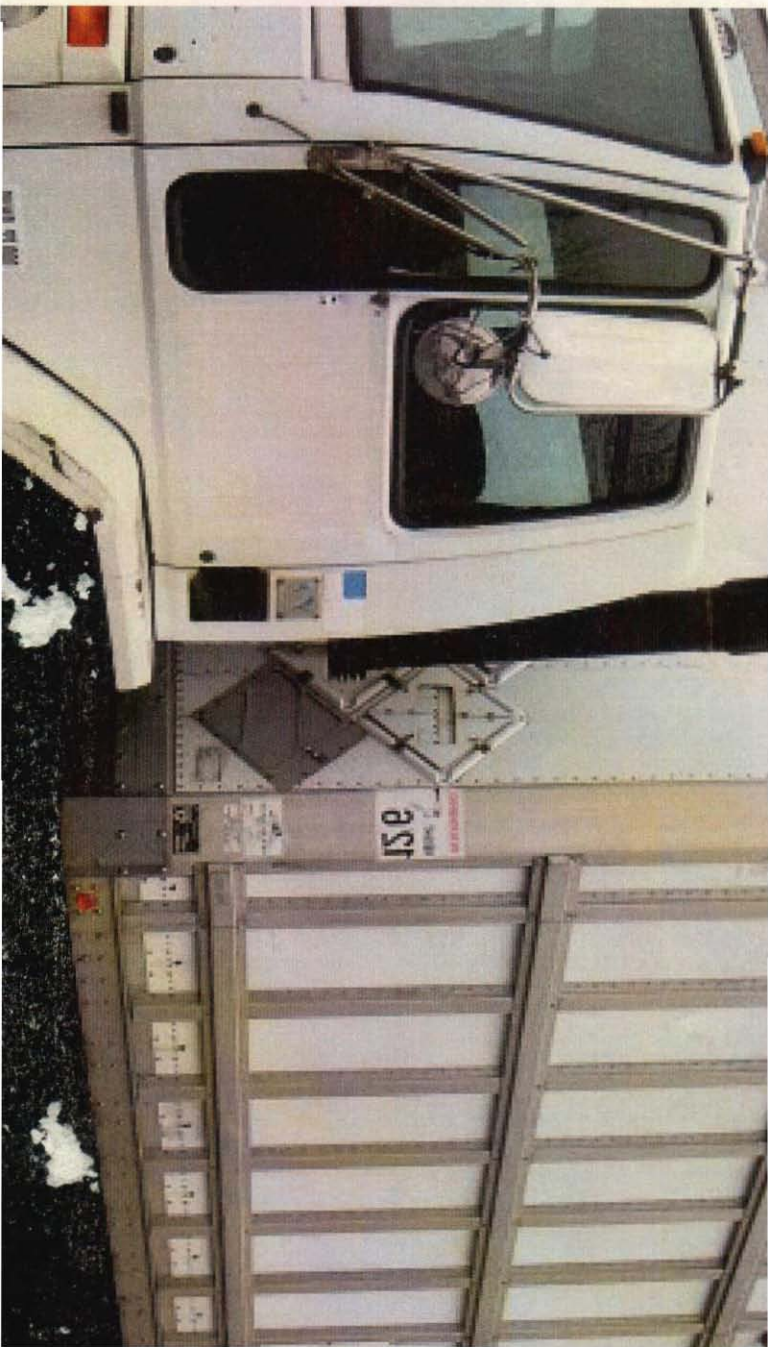
Does the front placards attached to the cargo body of this truck and behind the driver's cab satisfy/meet the requirements of the above mentioned section of the HMR 49 CFR?

Looking forward to hearing from you soon. You may reply via email or by mailing your response to my attention at the address provided below.

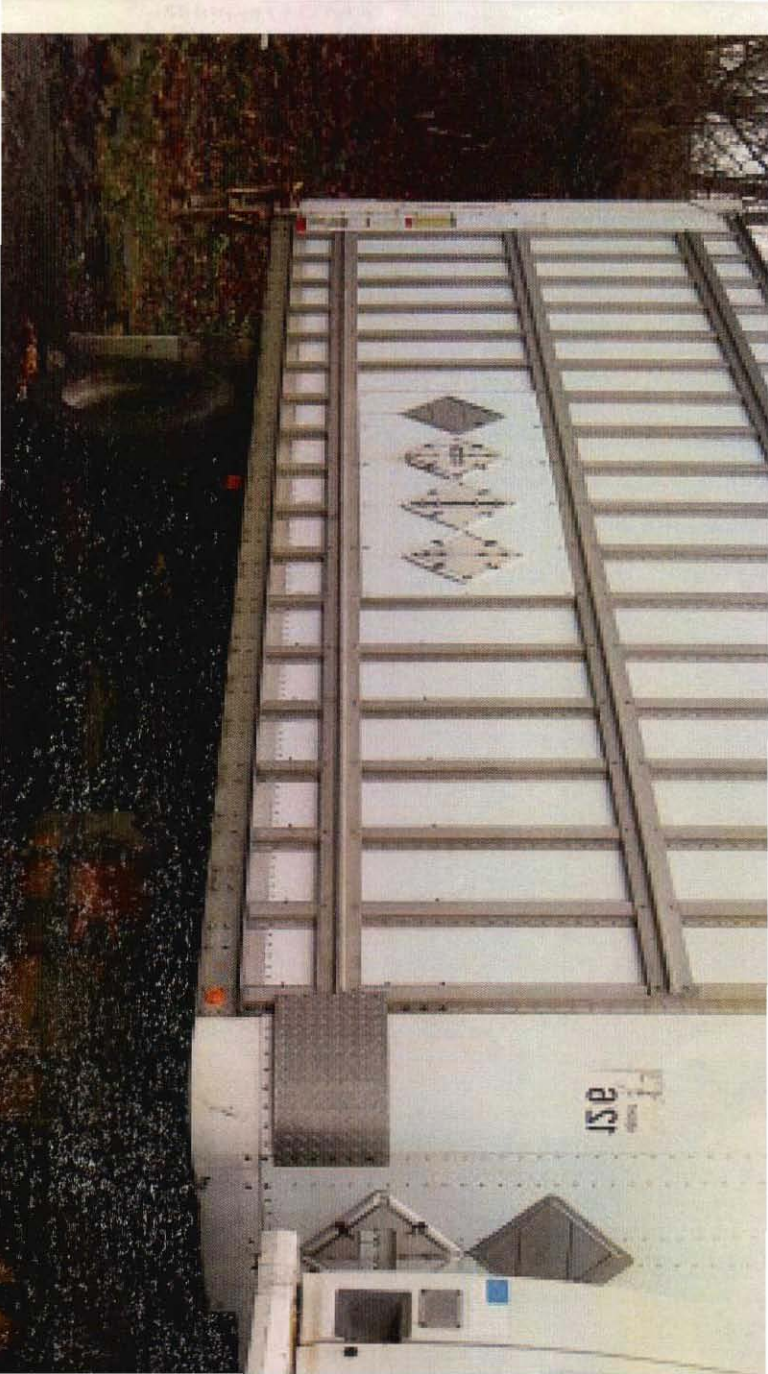
Sincerely,

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