



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

JUN 22 2011

Mr. Michel Chammas
President
Chammas Cutters, Inc.
11320 FM 529 Road,
Houston, TX 77041-3222

Ref. No.: 11-0107

Dear Mr. Chammas:

This responds to your May 11, 2011 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to UN 1746, Bromine Trifluoride, 5.1(6.1)(8), PG I, Poison Inhalation Hazard Zone B. Specifically you ask what placards are required when shipping less than 1,000 pounds of this material.

Under the HMR, OXIDIZER placards for the primary hazard and POISON INHALATION HAZARD placards are required for your material, as prescribed by §§ 172.504(e) Table 2, and 172.505(a) respectively. The 454 kg (1,001 pounds) exception in § 172.504(c) does not apply to a material that is required to display a subsidiary POISON INHALATION HAZARD placard in accordance with § 172.505(a). As specified in § 172.505(d), display of the CORROSIVE placard for the subsidiary hazard is permissible, but not required.

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

Sincerely,

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

Andrews
§ 172.101
§ 172.550

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Thursday, May 12, 2011 12:53 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: request for formal letter of interpretation

Placarding
11-0107

Hi Carolyn,

The caller below requested a formal letter of interpretation.

Thanks,
Victoria

Victoria Lehman
Hazmat Information Center (HMIC)
<http://phmsa.dot.gov/hazmat/info-center>
(202) 366-1035

From: Chammas Cutters [<mailto:info@chammascutters.com>]
Sent: Wednesday, May 11, 2011 4:01 PM
To: INFOCNTR (PHMSA)
Cc: 'Michel Chammas'
Subject: request for formal letter of interpretation

To Whom It May Concern,

I am writing to request clarification of placarding provisions listed in the HMR, 49 CFR. Our question is as follows:

What placards are required on a vehicle transporting less than 1,000 lbs of non-bulk packages containing UN1746, Bromine Trifluoride, 5.1 (6.1)(8), PG I, Poison Inhalation Hazard Zone B? Specifically, is the corrosive placard required?

Thank you,
Michel Chammas
President
Chammas Cutters, Inc.