



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

**JAN 3 0 2011**

Mr. Tom Forbes  
Public Utilities Commission of Ohio  
Transportation Department  
Compliance Division  
180 East Broad Street, 4<sup>th</sup> Floor  
Columbus, Ohio 43215-3793

Ref No. 11-0298

Dear Mr. Forbes:

This responds to your November 28, 2011 request for clarification on placarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). According to your letter, a carrier is transporting "UN 27819, Acetic acid solution, 8, (3), PG II, Ltd Qty" and "UN 3265, Corrosive liquid, acidic, organic, n.o.s, 8, PG II (corrosive liquid), Ltd Qty" in a quantity over 1,000 pounds. You ask if it is permissible to placard the vehicle with Class 3 FLAMMABLE placards for the subsidiary hazard and display no other placards for the primary hazard.

The answer to your question is no. Given that you are shipping limited quantities, placarding is not required (§ 172.500(b)(3)). However, if you choose to placard you may do so in accordance with § 172.502(c). Placarding must be in conformance with § 172.504, based on the placarding tables in paragraph (e) of that section. For the example presented, the CORROSIVE placard would be displayed. In addition to the CORROSIVE placards, you may placard for subsidiary hazards in accordance with § 172.505(d).

I hope this answers your inquiry.

Sincerely,

Ben Supko  
Acting Chief, Standards Development Branch  
Standards and Rulemaking Division

Boothe  
§172.202  
Shipping Papers  
11-0298

**Drakeford, Carolyn (PHMSA)**

---

**From:** INFOCNTR (PHMSA)  
**Sent:** Monday, November 28, 2011 3:43 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Placarding Clarification  
**Attachments:** FedEx Shipping Paper.pdf

Hi Carolyn,

The following caller requested this e-mail be submitted for a formal letter of interpretation during his 11/28 phone call with Andrew in the Info Center.

Thanks,  
Victoria

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

---

**From:** Forbes, Tom [<mailto:Tom.Forbes@puc.state.oh.us>]  
**Sent:** Monday, November 28, 2011 9:15 AM  
**To:** PHMSA HM InfoCenter  
**Subject:** Placarding Clarification

I am requesting clarification of the Hazardous Materials Regulations pertaining to permissive placarding.

A carrier is transporting hazardous materials UN2789, acetic acid solution, 8, (3), PG II Ltd Qty and UN3265, Corrosive liquid, Acidic, organic, NOS, 8, PG II (corrosive liquid), Ltd Qty in a quantity over 1000 pounds. The vehicle is transporting no other hazardous materials. (shipping paper attached)

Is it permissive to placard the vehicle on all four sides with class 3 flammable placards for the subsidiary hazard and display no other placarding for the primary hazard?

*Thank you,  
Tom Forbes  
Public Utilities Commission of Ohio  
Transportation Department  
Compliance Division  
180 East Broad Street, 4th Floor  
Columbus, Ohio 43215-3793  
(614) 644-0296 Phone  
(614) 466-2753 Fax*

*DRAFT - This document is created only for the purposes stated within. It is intended solely for staff discussion, reflecting the views of the author(s) and not necessarily the view of the staff as a whole or the Commission*

(WP) Requested by BJP5857 Index Value 2349757896 XX DR 1



# DELIVERY RECEIPT



**Freight Bill 2349757896 R0**

2200 FORWARD DRIVE  
HARRISON, AR 72601

Ship Date 10/13/2011	Bill of Lading 212537640
P.O. 22608	Shipper Reference
Origin ROC	Destination KMZ

fedex.com 1.866.393.4686

<b>Consignee</b> KALAMAZOO X-RAY SALES INC 916 PORTAGE INDUSTRIAL DR PORTAGE MI 49024 UB	Trailer # 2500616	<b>Shipper</b> CARESTREAM HEALTH 1600 LEXINGTON AVE STE 356 CENTRAL RECEIVING DOCK B/C/D ROCHESTER NY 14606-3061 US
---	-------------------	--

**FedEx Freight Priority**

DRIVER COPY

PIECES	HT/WT	DESCRIPTION	WT/LBS	CLASS	RATE	TOTAL CHARGES
114	42	PO# 22608 HAZARDOUS MATERIAL CHARGE CLAIMS ELIMINATION TARGET ACCOUNT 50X10 HEALTH IMAGING RELATED PRODUCTS X BOX, ACETIC ACID SOLUTION, 8 (3) ON 2789 PG11, LTD QTY ACETIC ACID SOLUTION EMERGENCY CONTACT 800-424-9300 ERI PROVIDER: CHEMTREC X BOX, CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S., 8, UN1265, PG11 (CORROSIVE LIQUID), LTD QTY CORROSIVE LIQUID ERI PROVIDER: CHEMTREC ** ANY ADDITIONAL SERVICES MAY RESULT IN ADDITIONAL CHARGES **	3337 1067	039740-00 039740-00	100 100	
				039740-00	100	

**PREPAID - WILL INVOICE THIRD PARTY**

ACCESSORIAL SERVICES PERFORMED:  
 INSIDE DELIVERY     SORT & SEGREGATE     DETENTION  
 RESIDENTIAL LIMITED ACCESS     UPS GATE     OTHERS

Deliv. Driver & #: *Don Towse 24/4675*

Date: *10-17-11*    Arrive: *1145*    Depart: *1155*

# of Skids:    # of Pcs:    OS&D #:

Shipment received in apparent good order with wrap intact unless otherwise noted.

Received by: \_\_\_\_\_

Over     Damage    Exceptions:  
 Short     Wrap Broken

**PREPAID - WILL INVOICE RESPONSIBLE PARTY**

Customer Requirements/Appointment Instruction