



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

NOV 30 2012

Mr. David Arange
Ammunition Surveillance Inspector
Military Ocean Terminal Concord (MOTCO)
Concord, CA 94520

Reference No. 12-0206

Dear Mr. Arange:

This is in response to your September 11, 2012 letter requesting clarification from the Pipeline and Hazardous Materials Safety Administration (PHMSA) on the requirements for explosive placards on rail cars under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your inquiry relates to placarding of Division 1.1 or 1.2 explosives packaged in 20' shipping containers loaded on flat rail cars. You note that the regulations in § 172.508(a) require placards to be displayed on each freight container. Specifically, you ask if the flat rail cars as shown in the photograph you provided must also display an explosives placard on a white background as required by § 172.510(a)?

The answer is yes. The placards on the 20' containers do not meet the requirements of 172.510(a). Therefore, the freight containers on a flat rail car, as shown in the picture you provided, must be placarded with the explosives placards on a white background in conformance with §172.510(a).

I hope this satisfies your request.

Sincerely,

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

Drakeford, Carolyn (PHMSA)

Andrews
§ 172.508(a)
§ 172.101

From: Eckenrode, Andrew.CTR (PHMSA) on behalf of INFOCNTR (PHMSA)
Sent: Thursday, September 13, 2012 11:55 AM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Placarding of Rail Cars (UNCLASSIFIED)
Attachments: rail car.jpg

Explosives
12-0206

Carolyn,

This gentleman requested we forward his email as a letter of interpretation.

Thanks,

Andrew

From: Arange, David W CIV USARMY SDDC (US) [<mailto:david.w.arange.civ@mail.mil>]
Sent: Tuesday, September 11, 2012 4:05 PM
To: INFOCNTR (PHMSA)
Subject: Placarding of Rail Cars (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

To whom it may concern

I am a Dept. of Army employee shipping explosives packaged in 20' shipping containers on flat rail cars. I would appreciate clarification of 49 CFR Change 1 (10-11 Edition). The area in question is 172.508(a). This paragraph deals with placarding of rail cars. The paragraph states

172.508(a) "Each person offering a hazardous material for transportation by rail shall affix to the rail car containing the material, the placards specified in this subpart. Placards displayed on motor vehicles, transport containers, or portable tanks may be used to satisfy this requirement, if the placards otherwise conform to the provisions of this subpart."

Paragraph 172.510(a) mentions white square backgrounds and states

172.510(a) "*White square background.* The following must have the specific placards placed on a white square background, as described in 172.527.

172.510(a)(1) Division 1.1 and 1.2 (explosive) material which require EXPLOSIVE 1.1 or 1.2 placards affixed to the rail car.

My question is, do the placards on the explosive laden 20' containers loaded on flat cars meet the placarding requirements as mentioned in 172.508, or must we placard the flat rail car with a white background placard. I have attached a picture for reference and want to know if this is the requirement or can it be shipped without the white background placard.

v/r
David Arange
Ammunition Surveillance Inspector
MOTCO
Concord, Ca.
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Classification: UNCLASSIFIED

Caveats: NONE



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