



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

APR 15 2002

Ms. Barbara Konrad
Manager, Transportation Safety
Honeywell International, Inc.
P. O. Box 1057
Morristown, NJ 07962-1057

Reference No.: 02-0089

Dear Ms. Konrad:

This is in response to your letter requesting clarification of the placarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state that during an audit by the Federal Railroad Administration (FRA), disagreement arose over the correct placarding for a tank car containing hydrogen fluoride, anhydrous. It is your understanding that Division 6.1 (other than Inhalation Hazard Zone A or B) materials must be placarded POISON (see §§ 172.504(e) and 171.14(b)) and that § 172.519(b)(4) allows the use of the POISON placard in lieu of the POISON INHALATION HAZARD placard.

The current HMR requirements for placarding shipments of hydrogen fluoride, anhydrous, are confusing and will be addressed in an upcoming rulemaking. A tank car containing hydrogen fluoride, anhydrous, must display CORROSIVE and POISON INHALATION HAZARD placards.

Your understanding of the placarding table in § 172.504 and the transitional provisions in § 171.14 is correct. Poisonous by inhalation (PIH) liquids are typically assigned to either Inhalation Hazard Zone A or B. Hydrogen fluoride, anhydrous, a corrosive liquid which also meets the definition of a PIH material in § 171.8, is an exception in that it is assigned to Inhalation Hazard Zone C. The subsidiary placarding requirements in § 172.505(a) require that the transport vehicle must be placarded with the POISON INHALATION HAZARD placard in addition to any other required placards. It applies to PIH materials in all hazard zones. Section 172.519(b)(4) does not apply. This latter provision addresses the display of the hazard class or division number in the lower corner of a placard and the transition period that permits continued use of subsidiary placards without the hazard class or division number in domestic transportation by rail or highway.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



020089

171.14

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March 21, 2002

Research and Special Programs Administration
Office of Hazardous Materials Standards (DHM-10)
US Department of Transportation
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Honeywell

Corbin
§ 171.14
§ 172.504
Placarding
02-0089

Subject: Interpretation on Marking and Placarding Requirements for Anhydrous Hydrogen Fluoride, 8, UN1052, PG I (6.1) Poison Inhalation Hazard Zone C

Dear Sir or Madam:

During a routine Federal Railroad Administration audit, there arose disagreement over the placarding requirements of a tank car loaded with anhydrous hydrogen fluoride (AHF).

Honeywell believes that tank cars of AHF are correctly marked and placarded if they contain the following:

Marks: Proper Shipping Name – Hydrogen Fluoride, Anhydrous
Identification Number – 1052 (displayed on the primary hazard placard)
Additional Marking – Inhalation Hazard

Placards: Class 8 Primary Placard
Class 6.1 Subsidiary Placard (not a PIH placard)

We believe this marking and placarding is correct, for the following reasons:

- (1) According to the placard substitution table in both 172.504 and 171.14 only liquids that meet the criteria or are assigned to zone A or B require the PIH placard. All other class 6.1 materials, require only the poison placard.
- (2) Even though 172.505(a) requires that materials subject to the PIH shipping paper requirements (all PIH zones whether primary or subsidiary, and thus AHF) must be placarded with a PIH placard, 172.519(b)(4) authorizes the use of a regular poison placard.

This section states that "stocks of non-permanently affixed subsidiary placards in compliance with the requirements in effect on September 30, 2001, may continue to be used in domestic transportation by rail or highway until October 1, 2005 or until current stocks are depleted, whichever occurs first." On

September 30th (one day before the PIH placarding requirements became mandatory) a poison subsidiary placard for AHF was perfectly correct.

For these reasons, AHF tank cars, displaying both a corrosive and a poison placard, and showing the marks indicated on page one of this letter, would be in complete compliance with the Hazardous Materials Regulations until October 1, 2005.

I look forward to hearing your opinion on this matter. If you require any additional information, or would like to discuss this in greater detail, please do not hesitate to call me at the number listed below.

Very truly yours,



Barbara Konrad
Manager, Transportation Safety
Honeywell International Inc.
973-455-4009

Cc: Pat Williams - Honeywell
Derek Fletcher - Honeywell
Jeff Leese - Honeywell
Jim Duncan - FRA