



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

FEB 21 2008

Mr. Michel Chammas  
General Manager  
Pipe Recovery Systems Inc.  
1462 Brittmoore Road  
Houston, Texas 77043

Ref. No.: 07-0230

Dear Mr. Chammas:

This responds to your December 4, 2007 letter requesting clarification of the placarding provisions specified in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your scenarios involve the application of §§ 172.504 and 172.505. Your questions are paraphrased and answered below.

Q1. What placards are required on a freight trailer transporting less than 1,000 pounds of non-bulk packages that contain a material, UN1746, Bromine Trifluoride, 5.1 (6.1) (8), PG I, Poison-Inhalation Hazard Zone B?

A1. Under the HMR, OXIDIZER placards for the primary hazard and POISON INHALATION HAZARD placards are required, 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.

Q2. What placards are required on the freight trailer specified above in Q1 if a box of Division 1.4G Igniters, weighing less than 5 pounds, is added?

A2. See A1. No additional placards are required. The Division 1.4G material is eligible for the § 172.504(c) placarding exception even when transported on the same transport vehicle with non-bulk packages of a Division 5.1, Poison-Inhalation Hazard material subject to § 172.505.

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



Satterthwaite  
§ 172.504  
§ 172.505  
Placarding  
07-0230

December 4, 2007

Mr. Edward T. Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2<sup>nd</sup> Floor  
Washington, DC 20590

RE: Request for Letter of Interpretation for 49 CFR 172.504 and 172.505

Dear Mr. Mazzullo:

We have received varying interpretations of the placarding requirements listed under 49CFR 172.504 and 172.505. Your advice is now requested to clarify the requirements so that we can ensure all regulations are being followed accordingly.

Our questions are as follows:

- Q1. If I am shipping a material, UN 1746 Bromine Trifluoride (which is primary class 5.1 oxidizer, subsidiary risk 6.1 (poisonous by inhalation), subsidiary risk 8 corrosive) and the quantity is under 1001 lbs, what placards, if any, are required on a freight vehicle?
- Q2. If I am shipping the Bromine Trifluoride along with a box of class 1.4G Igniters (weighing less than 5 lbs), what are my placarding options?

Thank you,

Michel Chammas  
General Manager  
Pipe Recovery Systems, Inc.