



U.S. Department  
of Transportation

Pipeline and Hazardous  
Materials Safety  
Administration

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

MAR 05 2013

Mr. Mike Brust, CDS  
Manager, Corporate Safety  
FedEx Freight, Inc.  
2200 Forward Drive  
Harrison, AR 72601

Ref. No. 13-0026

Dear Mr. Brust:

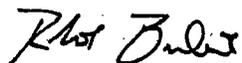
This responds to your January 25, 2013 request for clarification of the placarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask for clarification on the use of the DANGEROUS placard in § 172.504 for two specific shipments.

In your letter, you describe a shipment of 2,337 pounds of non-bulk cylinders of UN 1013, compressed gas, Division 2.2, (non-flammable gas) loaded at one facility, and 1,269 pounds of non-bulk pails of UN 1263, Class 3, flammable liquids placed on a trailer. You ask if a NON-FLAMMABLE GAS placard and a DANGEROUS placard on the trailer comply with § 172.504 requirements?

The answer to your question is yes. Section 172.504(b) specifies that a transport vehicle containing non-bulk packages with two or more categories of hazardous materials that require different placards specified in table 2 of paragraph (e) of this section may be placarded with a DANGEROUS placard instead of the separate placarding specified for each of the materials in table 2 of paragraph (e) of this section. However, when 1,000 kg (2,205 pounds) aggregate gross weight or more of one category of material is loaded at one loading facility, the placard specified in table 2 of paragraph (e) of this section for that category must be applied. Based on the scenario you describe, the NON-FLAMMABLE gas placard must be displayed and either the DANGEROUS or FLAMMABLE LIQUID placard may represent the flammable liquid.

I hope this answers your inquiry. If you need additional assistance, please contact this office  
at  
(202) 366-8553.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert Benedict".

Robert Benedict  
Chief, Standards Development Branch  
Standards and Rulemaking Division

## **Drakeford, Carolyn (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Monday, January 28, 2013 1:47 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Request for Interpretation - Placarding Question

Hi Carolyn,

We received the following request for a formal letter of interpretation.

Thanks,  
Victoria

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**From:** Brust, Mike --- Mgr-Corporate Safety --- GO [<mailto:mike.brust@FEDEX.COM>]  
**Sent:** Friday, January 25, 2013 6:41 PM  
**To:** Brust, Mike --- Mgr-Corporate Safety --- GO; INFOCNTR (PHMSA)  
**Cc:** Richesin, Sandra --- Safety Compliance Specialist --- GO  
**Subject:** RE: Request for Interpretation - Placarding Question

I corrected my mistake of listing it CFR 49 below to display 49 CFR

Thank you

Mike Brust, CDS  
Mgr-Corporate Safety  
FedEx Freight, Inc.  
870-704-5346

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**From:** Brust, Mike --- Mgr-Corporate Safety --- GO  
**Sent:** Friday, January 25, 2013 5:14 PM  
**To:** [infocntr@dot.gov](mailto:infocntr@dot.gov)  
**Cc:** Brust, Mike --- Mgr-Corporate Safety --- GO; Richesin, Sandra --- Safety Compliance Specialist --- GO  
**Subject:** Request for Interpretation - Placarding Question

January 25, 2013

### **Pipeline and Hazardous Materials Safety Administration (PHMSA)**

U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
East Building, 2nd Floor  
1200 New Jersey Ave., SE  
Washington, DC 20590

I would like to have an interpretation concerning the use of the Dangerous placard.

We would like to know what the appropriate placards are allowed to be displayed on a trailer containing the following two items:

The first shipment contained non-bulk cylinders of Non-Flammable Gas class 2.2 that weighed 2,337 lbs loaded at one facility and the second shipment had 1,269 lbs of Flammable Liquid class 3 in pails.

Can we display a Non-Flammable Gas 2 placard and a Dangerous placard to meet the regulations found in 49 CFR 172.504?

Thank you for your time and I will be looking forward to the interpretation to this situation.

Mike Brust, CDS

Mgr-Corporate Safety

FedEx Freight, Inc.

870-704-5346