



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

DEC 15 2015

Ms. Sändra Miller
Regulatory Specialist
ICC Compliance Center
2150 Liberty Drive
Suite 1
Niagara Falls, NY 14304

Reference No. 15-0166

Dear Ms. Miller:

This responds to your email, dated August 10, 2015, in which you request clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask for guidance concerning 49 CFR 172.332(c)(1). Your questions are paraphrased and answered as follows.

Q1. The quoted size for UN numbers is 88 mm (3.5 inches), with no tolerances mentioned. What are the acceptable tolerances for the size of the numbers (e.g., UN and other regulations refer to "at least...mm high")?

A1. As specified in 49 CFR 172.332(c)(1), the size of the numerals of the identification number displayed on a placard must be 88 mm (3.5 inches) in black Alpine Gothic or Alternate Gothic No.3 on a white background 100 mm (3.9 inches) high and approximately 215 mm (8.5 inches) wide. For identification numbers that are lost, damaged, or destroyed during transportation, § 172.338 states that the marking may be done by hand without regard to the size and font requirements if the hand written markings are legible and written with an indelible marking material.

In addition, Subpart C of Part 171 authorizes, with certain conditions and limitations, the offering for transportation and the transportation in commerce of hazardous materials in accordance with the International Civil Aviation Organization Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Technical Instructions), the International Maritime Dangerous Goods (IMDG) Code, the Transport Canada's Transportation of Dangerous Goods (TDG) Regulations, and the International Atomic Energy Agency (IAEA) Regulations for the Safe Transport of Radioactive Materials (IAEA Regulations). Therefore, provided the applicable

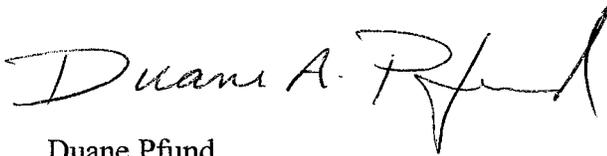
requirements of §§ 171.12, 171.22, 171.23, 171.24, and 171.25 are met, markings conforming to the international standards may be used in place of a corresponding marking conforming to the requirements of 49 CFR Part 172, Subpart D.

Q2. There are 2 specific fonts specified. Are there any provisions to accept other fonts with similar appearance?

A2. See A1.

I hope this satisfies your request. Please let us know if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Duane A. Pfund". The signature is written in black ink and is positioned above the typed name.

Duane Pfund
International Standards Coordinator
Office of Standards and Rulemaking

Antonelli
§ 172.332 (c)(1)
marking
15-0166

Dodd, Alice (PHMSA)

From: Geller, Shelby CTR (PHMSA)
Sent: Monday, August 10, 2015 12:40 PM
To: Hazmat Interps
Subject: FW: Font and size of numbers on placards

Dear Shante and Alice,

Forwarded is a request for a formal letter of interpretation.

Thanks,
Shelby

From: Sandra Miller [<mailto:Sandra.Miller@thecompliancecenter.com>]
Sent: Monday, August 10, 2015 8:55 AM
To: PHMSA HM InfoCenter
Subject: Font and size of numbers on placards

Hazardous Materials Information Center:

I am writing to request a formal letter of interpretation. Can you please provide guidance in regards to 49CFR§172.332 (c)(1)?

The regulations state:

“(c) Placards. Display of an identification number on a hazard warning placard shall be in conformance with the following:

- (1) The identification number shall be displayed across the center area of the placard in 88 mm (3.5 inches) black Alpine Gothic or Alternate Gothic No. 3 numerals on a white background 100 mm (3.9 inches) high and approximately 215 mm (8.5 inches) wide and may be outlined with a solid or dotted line border.”

Based in this section my questions are:

1. The quoted size for UN numbers is 88 mm (3.5 inches), with no tolerances mentioned. What are acceptable tolerances for the size of the numbers (e.g. UN & other regulations refer to “at least...mm high”)?
2. There are 2 specific fonts specified. Are there any provisions to accept other fonts with similar appearance?

Thank you and I look forward to your correspondence.

Best regards,

Sandra Miller
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888-442-9628 ext. 230 - <http://www.thecompliancecenter.com>

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