



U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**

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

MAY 13 2010

Mr. Wes Pace  
Director, Hazmat Compliance  
Landstar Transportation Logistics  
13410 Sutton Park Drive, South  
Jacksonville, FL 32224

Ref. No. 10-0075

Dear Mr. Pace:

This responds to your April 14, 2010 request for clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your scenario involves a flatbed trailer with multiple pallets of non-bulk packages (e.g., 5 gallon pails) that have been individually shrink wrapped and properly secured to a transport vehicle. Specifically, you ask whether the requirements in § 172.516 are met if the required placards (adhesive backed) are placed on the shrink wrapped pallets so that the placards are visible from all four sides of the transport vehicle.

The required placards may be attached or affixed to the load of packages instead of the truck itself. However, the shipment must conform to all the display and visibility requirements. Each placard must be readily visible from the direction it faces except when the vehicle is attached to another motor vehicle (§ 172.516(a)). The required placards must be securely attached or affixed to the load of packages, and they must be located clear of appurtenances and devices (e.g. ladders, pipes, doors, and tarpaulin). The placards must also be affixed to a background of contrasting color or have a dotted or solid line outer border which contrasts with the background color (§ 172.516(c)).

I hope this answers your inquiry. If you need additional assistance, please contact this Office.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles E. Betts'.

Charles E. Betts  
Chief, Standards Development  
Office of Hazardous Materials Standards

Landstar Transportation Logistics, Inc.  
13410 Sutton Park Drive, South  
Jacksonville, FL 32224  
904 398 9400

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§172.516.  
Placarding  
10-0075

U.S. DOT  
PHMSA Office of Hazardous Materials Standards  
Attn: Mr. Edward Mazzullo  
East Building  
1200 New Jersey Avenue, SE.  
Washington, DC 20590-0001

Mr. Mazzullo,

Please except this letter as my request for an interpretation of 49CFR 172.516 (Visibility and Display of Placards). Specifically, I'm requesting clarification on the use of placards on shrink wrapped pallets of non-bulk packages on a flat bed to meet the transport vehicle placard requirements.

The scenario is, a flatbed trailer with multiple pallets of non-bulk packages (5 gallon pails for example) which have been individually shrink wrapped and are properly secured on the transport vehicle. Would the requirements of 172.516 be met if the required placards (adhesive backed) were placed on the shrink wrap of pallets in a manner where placards are visible from all four side of the transport vehicle?

There is no specific reference to this scenario in 172.516 (c) and it would seem as though the intent of the rule would be met when a transport vehicle had been placarded in the method described.

Your assistance is greatly appreciated.

Sincerely,

Wes Pace  
Director, Hazmat Compliance  
Landstar Transportation Logistics  
(904) 390-4815  
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