



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

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

FEB 14 2011

Mr. Thomas Ziebell
Senior Hazmat Editor
J.J. Keller & Associates, Inc.
P.O. Box 368
Neenah, WI 54957

Reference No. 10-0182

Dear Mr. Ziebell:

This is in response to your e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requirements for Class 3 combustible placards displaying identification numbers. You submitted three examples of placards and ask which one is in conformance with the HMR. Specifically, you ask whether the combustible placard should display a color in the outer border. You cite a 1991 letter of interpretation from this Office to J.J. Keller stating that the lower inner border as shown in the pictorial you submitted at that time should be eliminated. You further state that you were informed by members of our staff in subsequent telephone conversations in 1992 that of the three examples of placards that you submitted to them, Example B was the correct combustible placard and that Example C was not correct. You ask us to confirm these responses.

The 1991 letter of interpretation addressed rail transportation and we stated that the lower inner border of the combustible placard must be eliminated for transportation by rail. Section 172.332(c)(4) specifies:

'For a COMBUSTIBLE placard used to display an identification number, the entire background below the white background for the identification number must be white during transportation by rail and may be white during transportation by highway.'

Therefore, the answer given in the 1991 letter of interpretation is correct. That is, for transportation by rail, the authorized combustible placard must not display a lower inner border and it must have white as the entire background below the white background for the identification number. As such, the example shown in the pictorial accompanying the 1991 letter would require that the lower inner border be eliminated in order to be in compliance with the HMR for transportation by rail.

With respect to your 1992 telephone conversations with members of our staff, you asked them whether color may be displayed in the outer border of the combustible placard below the white background for the identification number. You were told that Example B without the border was in compliance with the HMR and that Example C with color in the outer border was not in compliance. This answer is also correct.

For your information, Example "A" is authorized if it meets the provisions of § 172.519(b)(2) or is used for transportation by highway (also see § 172.332(c)(4) above). Section 172.519(b)(2) specifies:

'The dotted line border shown on each placard is not part of the placard specification. However, a dotted or solid line outer border may be used when needed to indicate the full size of a placard that is part of a larger format or is on a background of a non-contrasting color.'

I hope this information is helpful. Please contact this office should you need additional assistance.

Sincerely,

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

T. Glenn Foster,
Chief, Regulatory Review and Reinvention Branch
Division of Standards and Regulations

Interp Ref # 10-0182

From: Thomas Ziebell [mailto:tziebell@JJKELLER.COM]
Sent: Thursday, August 26, 2010 11:51 AM
To: PHMSA HM InfoCenter
Subject: Interpretation on combustible placards

Dear Office of Hazardous Materials Standards,

I am requesting an interpretation on the display of an identification number on a combustible placard, as allowed by 172.332(c)(4). Attached are three examples of white-bottom combustible placards that have space for an identification number.

A June 17, 1991, interpretation addressed the color of the border on a combustible placard below the white background for the identification number. It stated that for a placard, as illustrated by Example A in the attached, the lower inner border should be eliminated. The entire background below the white background for the identification number must be white for rail shipment. When the border is removed the placard appears as Example B in the attached. This letter of interpretation does not currently appear on your web site.

In July and October 1992, I had phone conversations with Del Billings, Helen Engrum, and Jackie Smith about displaying color in the outer border of the placard below the white background for the identification number. The June 17, 1991 interpretation did not specifically address this issue. Was a placard such as Example B correct (no color in outer border) or was Example C correct (color in outer border)? The answer I got was that Example B was correct and Example C was incorrect.

I would appreciate a written interpretation on this issue. Is example B correct (no color in outer border) or is example C correct (color in outer border)?

Thank you for your assistance.

Tom Ziebell
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A.



B.



C.

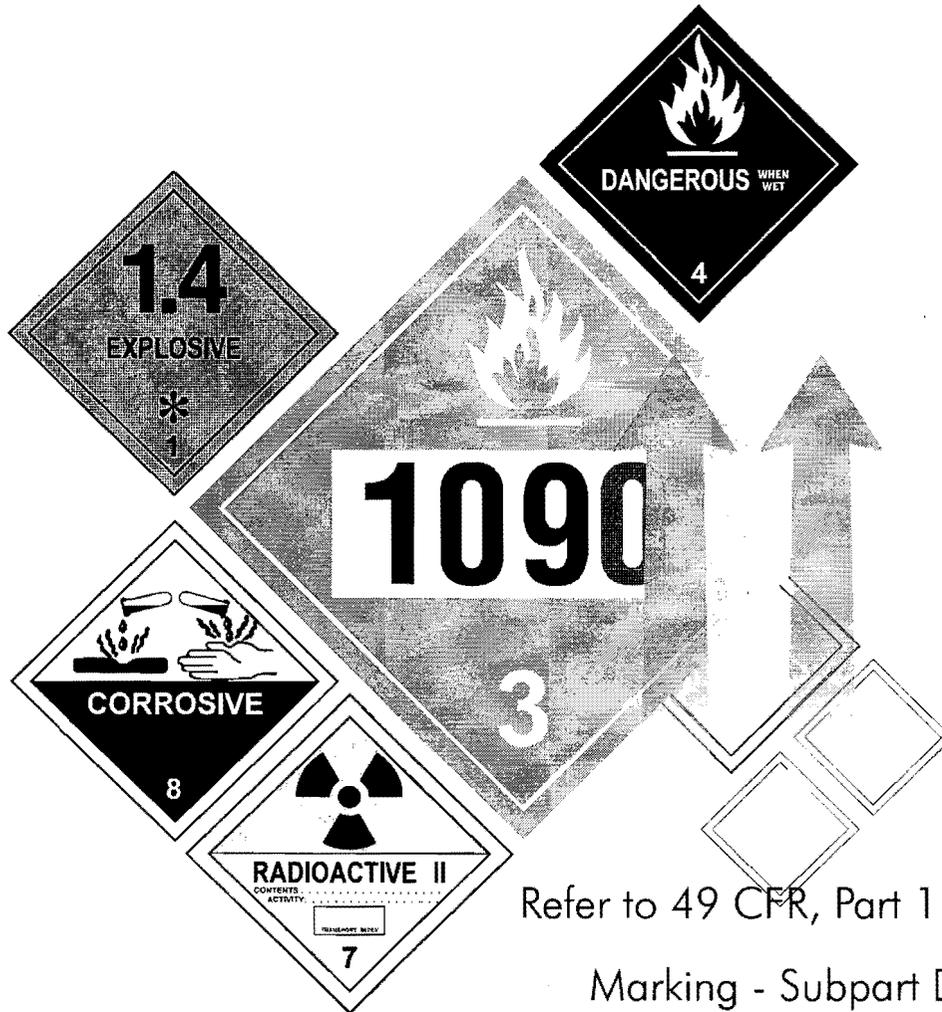




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DOT CHART 13

Hazardous Materials Marking, Labeling and Placarding Guide



Refer to 49 CFR, Part 172:

Marking - Subpart D

Labeling - Subpart E

Placarding - Subpart F

Emergency Response - Subpart G

NOTE: This document is for general guidance only and must not be used to determine compliance with 49 CFR, Parts 100-185.