



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

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

OCT 27 2010

Mr. Sam Chapman  
Headquarters Manager, Bureau of Explosives  
Transportation Technology Center, Inc.  
55500 DOT Road  
Pueblo, CO 81001

Ref. No.: 10-0204

Dear Mr. Chapman:

This responds to your September 21, 2010 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you would like clarification as to whether the text "RADIOACTIVE" is required on placards for Class 7 (radioactive) materials.

Section 172.519(b)(3) states that for other than Class 7 or the DANGEROUS placard, text indicating a hazard is not required. In your email you note that § 172.519(f) provides exceptions to the placarding requirements for hazardous materials offered for transportation under the provisions of Subpart C of Part 171, which provides authorization and requirements for the use of international transport standards and regulations. You indicate that the International Maritime Dangerous Goods (IMDG) Code states that the use of the word "RADIOACTIVE" in the bottom half of the placard is optional. This exception applies only to Class 7 (radioactive) materials that are transported under the provisions of the IMDG Code. Shipments of Class 7 (radioactive) materials transported under the provisions of the HMR require placards with text indicating the hazard.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Ben Supko".

Ben Supko  
Acting Chief, Standards Development  
Office of Hazardous Materials Standards

**Drakeford, Carolyn (PHMSA)**

Winter  
§ 172.519

**From:** Betts, Charles (PHMSA)  
**Sent:** Wednesday, September 22, 2010 7:48 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Placard Text Inquiry  
**Attachments:** US\_HMI\_for\_Rail\_2010\_Placard\_Text.pdf  
**Importance:** High

§ 172.334  
Placarding/Marking  
10-0204

Carolyn –

Please log in this request for interpretation and assigned for proper handling.

Thanks,  
Charles

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**From:** Sam\_Chapman@aar.com [mailto:Sam\_Chapman@aar.com]  
**Sent:** Tuesday, September 21, 2010 5:16 PM  
**To:** Kasey, Ray (FRA); boeci.ret@gmail.com  
**Cc:** cjlw19@cox.net  
**Subject:** Placard Text Inquiry

Ray and Al,

Charlie Wright and I are cleaning up AAR's United States Hazardous Materials Instructions for Rail before broadcasting it to AAR member railroads for final approval. While doing so, we have developed an inquiry regarding a statement found in the document about required placard text.

The statement currently reads: "Text indicating the hazard is not required on placards other than the DANGEROUS and RADIOACTIVE placards."

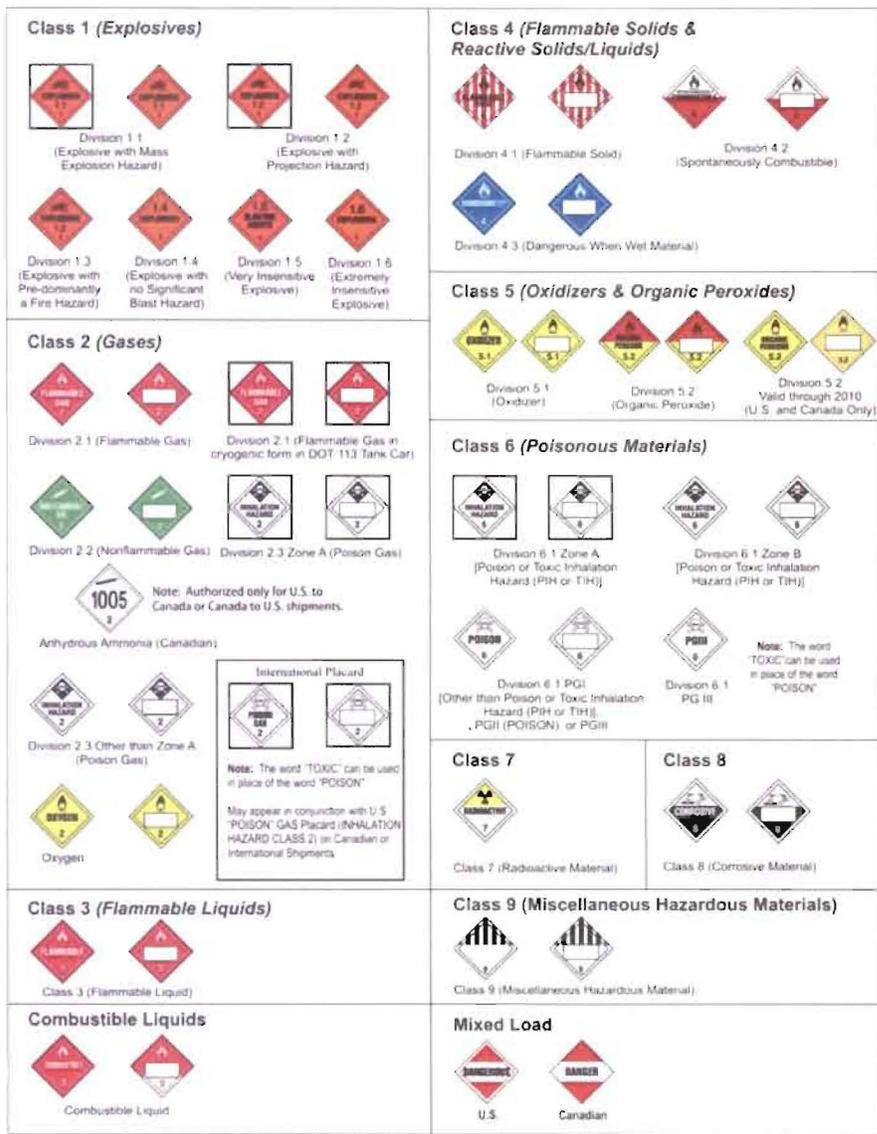
49 CFR 172.519(b)(3) requires a RADIOACTIVE placard to display hazard-indicative text, and 49 CFR 172.334(a) prohibits a RADIOACTIVE placard from showing an identification number. However, IMDG Code 5.3.1.2.2 makes optional the use of the word "RADIOACTIVE" to allow an appropriate UN Number to be displayed on a RADIOACTIVE placard. 49 CFR 172.519(f) says that a placard conforming to IMDG Code requirements may be used in place of a placard conforming to DOT requirements.

Thus, it would appear that text indicating the hazard is not always required on RADIOACTIVE placards, and the statement in question should be modified to read: "Text indicating the hazard is not required on placards other than the DANGEROUS placard."

The attachment contains a visual display of the above discussion. Please offer your perspectives as you wish. Thanks.

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Sam Chapman  
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BOE is a department of TTCI—a subsidiary of AAR



**Figure 4. Placards for Hazardous Materials by Hazard Class**

Text indicating the hazard is not required on placards other than the DANGEROUS and RADIOACTIVE placards. The worded hazard class text, except for DANGEROUS, does not have to be in English as long as the size, color, hazard class, and symbol are correct.

**Comment:** Replace "Anhydrous Ammonia Canadian Only" with "Anhydrous Ammonia (Canadian)" and "Note: Authorized only for U.S. to Canada or Canada to U.S. shipments."

Make sure all rectangular boxes inside placards are white with black borders. Also ensure white backgrounds.

**Comment:** 49 CFR 172.519(b)(3) requires a RADIOACTIVE placard to display hazard-indicative text, and 49 CFR 172.334(a) prohibits a RADIOACTIVE placard from showing an identification number.

However, IMDG Code 5.3.1.2.2 makes optional the use of the word "RADIOACTIVE" to allow an appropriate UN Number to be displayed on a RADIOACTIVE placard.

49 CFR 172.519(f) says that a placard conforming to IMDG Code requirements may be used in place of a placard conforming to DOT requirements.

Thus, it would appear that text indicating the hazard is not always required on RADIOACTIVE placards.

**Deleted:** Radioactive

**Comment:** Implied by 49 CFR 171.22(f)(3)? (Only specifies English for shipping papers and package markings, not placards.)