



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

**JUL 16 2012**

Mr. Nelson Lemmond  
Big Creek Media  
516 Chillingworth Lane  
Charlotte, NC 28211

Reference No.: 12-0094

Dear Mr. Lemmond:

This is in response to your April 12, 2012 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) as they pertain to placard visibility. Specifically you ask if the placarding placement shown in the photo you provided in your email is in compliance with §§ 172.504 and 172.516.

The answer to your question is yes. Section 172.504 provides general placarding requirements and exceptions and is not applicable to a discussion on placard placement. Section 172.516 requires placards on a motor vehicle to be clearly visible from the direction it faces. The placard location in the picture you provide is clearly visible. Due to the low hanging location of this proposed placarding location; extra care may need to be taken by the driver to ensure that the placard is maintained in accordance with § 172.516(c)(6) to ensure that the visibility of the placard will not be substantially reduced due to obscurement by dirt or other matter.

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

Sincerely,

Delmer Billings  
Senior Regulatory Advisor  
Standards and Rulemaking Division

Webb  
§§ 172.504  
§ 172.516

**Drakeford, Carolyn (PHMSA)**

**From:** INFOCNTR (PHMSA)  
**Sent:** Friday, April 13, 2012 11:36 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** Letter request

Placarding  
12-00 94

Hi Carolyn,

Mr. Lemmond requested that this e-mail be submitted as a formal letter of interpretation.

Thanks,  
Victoria

Victoria Lehman  
Hazmat Information Center (HMIC)  
<http://phmsa.dot.gov/hazmat/info-center>  
(202) 366-1035

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**From:** Hillman, Kenetha CTR (PHMSA) **On Behalf Of** Approvals (PHMSA)  
**Sent:** Friday, April 13, 2012 9:29 AM  
**To:** INFOCNTR (PHMSA)  
**Subject:** FW: Approvals/Competent Authority Approvals

Please read below.

Best Regards,  
Kenetha L. Hillman  
UniSpec Enterprises, Inc.  
DOT/PHMSA Contractor  
(202) 366-5758 phone  
(202) 366-7342 fax  
<http://www.unispec1.com/>

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**From:** Nelson Lemmond [<mailto:nlemmond@me.com>]  
**Sent:** Thursday, April 12, 2012 3:27 PM  
**To:** PHMSA HM Approvals  
**Subject:** Approvals/Competent Authority Approvals

To whom this may concern,

We wanted to obtain written confirmation that the attached proposed placard placement on the trailers lower rail is in compliance with both §§ 172.504 and 172.516.

Thank you,  
Nelson

R. Nelson Lemmond  
[nlemmond@me.com](mailto:nlemmond@me.com)  
704-451-5891

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