U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

APR 16 2001

Ms. Debra Olson
Transportation Officer
Naval Magazine Indian Island
Building 800
100 Indian Island Road
Port Hadlock, WA 98339-9723

Ref. No. 01-0049

Dear Ms. Olson:

This is in response to your letter dated February 9, 2001, requesting clarification of the placarding requirements for Division 1.1 and 1.2 materials transported by rail. Specifically, you ask if it is necessary to placard the rail car with EXPLOSIVE placards on a white square background in addition to the EXPLOSIVE placards already displayed on the bulk containers for transport by vessel and highway.

Section 172.510 requires that the specified placard for certain explosives be placed on a white square background (See § 172.527). If the placards affixed to the shipping containers are not displayed on a white square background the rail car must be placarded as specified in § 172.510. However, it is permissible to use the white square background for all modes of transportation. Therefore, if the shipping containers are initially placarded with the EXPLOSIVE placards on the white square background, no additional placarding is necessary.

I hope this satisfies your request.

Sincerely,

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards

01-0049

172.510

Engrum
§172.510
Placarding
for Rail
01-0049

Date: 09 Feb 01

From: Debra Olson, Traffic Manager, Naval Magazine Indian Island Port Hadlock, WA 98339
To: Department of Transportation, Ed Maezullo Interpretations Department

Subj: INTERPRETATION OF THE 49 CODE OF FEDERAL REGULATIONS (CRF), SECTION 172.510, SPECIAL PLACARDING PROVISIONS: RAIL

1. Naval Magazine Indian Island has within the past several years started shipping 1.1 and 1.2 explosives by rail. We have had some interpretation difficulties when it comes to the white square background that is indicative of rail shipments.

2. We receive International Standard Organization (ISO) containers by vessel to our seaport here at Naval Magazine Indian Island. These are the standard 8' X 20' X 8' containers. These shipping containers are stuffed from military installations overseas and when the reach our port, since we do not have a rail facility on station, are trucked forty five miles south to Naval Submarine Base Bangor where the rail head is located. The problem is that when these overseas installations stuff the material, they placard the material for vessel and for trucks, not for rail. Therefore, no white square background is placed behind the orange 1.1 and 1.2 placards. Here is where the interpretation gets fuzzy. We, at Traffic, are interpreting the 49 CFR to read that because it is going by rail, we must place additional placards on the rail to reflect the rail placarding requirement. We do this by affixing four additional placards (white square background with the orange 1.1 or 1.2, whatever is applicable) on each end and on both sides of each railcar. Some of the rail cars, if there are four containers to a railcar, display a total of twenty placards (four on each container and four on the rail car). Our headquarters is interpreting this section differently. Headquarters feels that since the containers themselves are placarded this somehow releases them from the obligation of the white square background placard.

3. Please clarify this point and tell me if we are doing some additional step by applying the white square background needlessly. If it is a requirement that is not needed, there would be a considerable cost savings in both time and money by deleting this additional placarding to the railcars. We are expecting another rail shipment is the near future and would very much like to have this matter cleared up and the correct interpretation placed in writing for future reference.

4. Please fax your interpretation to me as soon as possible at (~~360) 385-1995~~ 360 396 5309 or you can send it to us by mail at Transportation Officer, Naval Magazine Indian Island, 100 Indian Island Road, Bldg. 800, Port Hadlock, WA 98339-9723. If you have any questions, please feel free to telephone me at (360) 396-5296.

Debra Olson

Debra Olson
Traffic Manager