



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

FEB 22 2002

Mr. Dana Probasco
Haz-Mat Specialist, Safety Dept.
R+L Carriers
P.O. Box 271
Wilmington, OH 45177-0271

Ref. No. 02-0043

Dear Mr. Probasco:

This responds to your February 6, 2002 letter concerning placarding requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You ask how to placard a transport vehicle containing a Class 8 (corrosive), UN 1780, material in a bulk container weighing 1,500 pounds and a Class 3 (flammable liquid), UN 1993, material in a non-bulk package weighing 500 lbs. Specifically, you asked if the weights of the two materials are added together to determine placarding requirements.

The answer is no. Section 172.504(c) provides a placarding exception exclusively for non-bulk packages containing Table 2 materials, as defined in § 172.504(e), in a transport vehicle or freight container. If the aggregate gross weight of the non-bulk packages and their contents is less than 454 kilograms (1,001 pounds), a placard is not required for these materials. However, § 172.504(a) requires the transport vehicle or freight container to be placarded if it contains a bulk packaging of a Table 2 material. Therefore, the correct placard for your packaging scenario is "CORROSIVE." Although § 172.502 permits the use of a "FLAMMABLE" placard in addition to the "CORROSIVE" placard, it is not required.

I hope this satisfies your request.

Sincerely,

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



020043

172.504



R-L
Transfer, Inc.

GATOR
Freightways, Inc.

GREENWOOD
Motor Lines, Inc.

PARAMOUNT
TRANSPORTATION

Attention: Haz-Mat Info Center

From: Dana Probasco (Haz-Mat Specialist) Safety Department

Phone: (937) 382 - 1494

Fax: (937) 382 - 2677

Date: 2/06/02

Re: Request for Letter of Interpretation regarding a Placarding Question

Edmonson
\$172.504
Placarding
02-0043

To Whom It May Concern:

I am requesting a Letter of Interpretation regarding Table 2 Bulk and non-bulk packages of different classes on the same transport vehicle where the combination weights are over 1001 lbs.

Example:

A Class 8 UN1760 Table 2 Haz-Mat item in a Bulk container (1500lbs.) and a Class 3 UN1993 Table 2 Haz-Mat item in a Non bulk container (500 lbs.) are placed in the same transport vehicle. What will the Placards be?

We believe that the Table 2 materials in the Bulk vs. the Non-bulk are treated separately and the weights are not to be combined. Are we correct in our assessment?

I have spoken to your department on two different occasions regarding this but we would like a letter of interpretation for our records.

Thank you,

Dana Probasco
Haz-Mat Specialist

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