



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

MAR 26 2007

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

Robert Bailey
President
Approved Fire Protection Company
114 Saint Nicholas Avenue
South Plainfield, NJ 07080

Ref. No.:07-0058


Dear Mr. Bailey:

This is in response to your March 9, 2007 letter requesting clarification of the requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-185) applicable to the visibility and display of placards. Accompanying your letter are photographs of a Ford Econoline cube van with a clearly visible placard mounted on the front of the cargo body. You ask if the van may be placarded on the front portion of the cargo body as depicted in the photos or if it must be placarded on the front grille.

Section 172.516(b) allows the required placarding on the front of the motor vehicle to be displayed on the cargo body or grille, provided the it meets the visibility requirement in § 172.516(a). Therefore, the placarding may be placed on the front of the cargo body as depicted in your photographs.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



070058

172.516

Supko
§172.516
Placarding
07-0058

Jarman, Erin <PHMSA>

From: Robert Bailey [RBAiley@afpnj.com]
Sent: Friday, March 09, 2007 11:53 AM
To: INFOCNTR <PHMSA>
Subject: Request for formal interpretation - Mr. Edward Mazzullo
Attachments: Pictures - truck 030.jpg; Pictures - truck 031.jpg; Pictures - truck 033.jpg; NJSP Examination Report

Dear Mr. Mazzullo,

The DOT office has directed me to you to request a formal interpretation of the following: Proper placard location for the front of a Ford Econoline cube van.

We have recently been cited by the New Jersey State Police for improper placarding of our cube van. Attached is a copy of the Examination Report along with photos of our truck. Their concern was the placement of the front placard. As you can see by the photos, the front placard is placed on the box portion of the truck directly over the cab. The NJSP stated we should have placed the placard on the front grille area (per 172.504a). We believe the grille area is not the best location since it would be less visible and inhibit air flow for the cooling of the engine. Are we permitted to place the placard on the front portion of the box as shown in the photo?

Thank you in advance for your consideration to this matter,

Robert Bailey
President

Approved Fire Protection Company
114 Saint Nicholas Avenue
South Plainfield, New Jersey 07080-1808
908-755-2222 Fax: 908-769-1424

3/9/2007