



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

JUN 27 2007

1200 New Jersey Ave., S.E.
Washington, DC 20590

Ms. Pam Guffain
Vice President, Member Services
The Fertilizer Institute
820 First Street, N.E., Suite 430
Washington, D.C. 20002

Ref. No. 07-0120

Dear Ms. Guffain:

This is in response to your May 24, 2007 e-mail concerning the placarding requirements for the highway transportation of bulk packagings containing more than 5000 pounds of Ammonium chloride, liquid (Environmentally hazardous substance, liquid, n.o.s., 9, UN3082, III, RQ) under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

As provided by § 172.504(f)(9), when transported domestically a CLASS 9 placard is not required to be displayed on a transport vehicle containing a Class 9 material. However, a bulk packaging containing a Class 9 material must be marked with the appropriate identification number displayed either on a CLASS 9 placard, an orange panel, or a white square-on-point display configuration. (See §§ 172.302 and 172.332).

I hope this satisfies your request. If you have additional questions, please contact this office.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



070120

172.101
172.504(f)(9)

Mitchell
§ 172.101
§ 172.504(A)(9)
Applicability
07-0120

Drakeford, Carolyn <PHMSA>

From: Mitchell, Hattie <PHMSA>
Sent: Tuesday, June 19, 2007 4:00 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Interpretation - the Fertilizer Institute

Carolyn, please log in to me.
Thanks.

From: Pam Guffain [mailto:PGuffain@tfi.org]
Sent: Thursday, May 24, 2007 8:34 AM
To: Mitchell, Hattie <PHMSA>
Subject: Interpretation

Dear Hattie,

I hope this finds you well. It has been awhile since we have communicated.

I have had a conversation with the hazmat info office regarding an issue I am trying to resolve for one of our members and I just want to confirm that I am understanding this correctly.

Our member transports in bulk, domestically by land, ammonium chloride liquid. Ammonium chloride is listed as a hazardous substance in the DOT tables, but is not a hazardous material in 172.101. They transport in more than the RQ of 5,000 lbs.

It is my understanding that in the above case it is not required to be placarded, nor does the driver have to have a hazmat endorsement. The only requirement as I understand it is to have the container marked as UN 3082 which is the identification number for environmentally hazardous substances, liquid, n.o.s.

Thanks for your attention Hattie. I assume you are in your new building along with the others! I am coming over today to see the new "digs" and visit with Charlie Hochman.

Pam

Pam Guffain
Vice President, Member Services
The Fertilizer Institute
820 First Street, N.E., Suite 430
Washington, D.C. 20002
202-515-2704 (direct)
202-962-0577 (fax)
202-257-3043 (cell)