



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

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

SEP 6 2007

Mr. Chris W. Gibson  
EHS&R Manager  
Hawkins, Inc.  
3100 East Hennepin Avenue  
Minneapolis, MN 55413

Ref. No. 07-0151

This is in response to your February 8, 2007 letter concerning the applicability of the Hazardous Materials Regulations (HMR: 49 CFR 171-180) to the location of placards on Intermediate Bulk Containers (IBCs). We apologize for the delay.

In your letter, you state that many IBCs are now built with large-radius corners. You state that these large-radius corners provide an area on which to affix a placard. You also provide photographs of a placard affixed on a large-radius corner of an IBC. You ask whether these corners are an acceptable "side" to affix a placard as required by the HMR.

It is the opinion of this Office that provided the placards are affixed on two opposite sides of an IBC, a large-radius corner is an acceptable area to affix a placard.

I hope this information is helpful.

Sincerely,

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



070151

172.514(c)

# HAWKINS, INC.

Foster  
§ 172.514(c)  
Placarding  
07-0151

February 8, 2007

Mr. Edward T. Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
400 7th Street S.W.  
Washington, D.C. 20590-0001

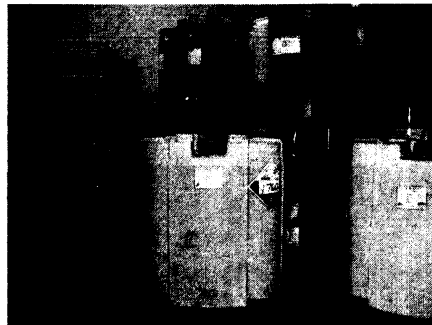
RE: Location of Placards for IBC Containers  
49 CFR 172.514(c)

Dear Mr. Mazzullo:

Due to the variety of construction of IBC containers, the question has arisen as to what constitutes a "side". Many of the containers are now built with large-radius corners, presenting an area for which a placard fits. (see Picture 1). This location has the desirable effect that the placard is protected from damage during transportation operations.



Picture 1



Picture 2

Question: Is this location acceptable to the DOT, and in compliance with the above regulation?