



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

MAR 20 2007

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

Mr. Byver Daniell
Hy Yield Bromine Inc.
4310 National Guard Drive
Plant City, FL 33563-1112

Ref. No.: 07-0019

Dear Mr. Daniell:

This is in response to your telephone conversation with a member of my staff and January 26, 2007 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to placarding and marking. Your scenario involves a transport vehicle carrying 31,500 pounds of UN 1581, Chloropicrin and methyl bromide mixtures, Division 2.3, in non-bulk packages. The transport vehicle displays a POISON GAS placard, containing the identification number "1581", on each side and each end. You ask if the transport vehicle is required to be marked with the words "INHALATION HAZARD."

The answer is no. Each non-bulk package must be marked "Inhalation Hazard" in association with the required label and shipping name as required by § 172.313(a). A transport vehicle containing large quantities of a material poisonous by inhalation in non-bulk packages must be marked, on each side and each end as specified in § 172.332 or § 172.336, with the identification number specified for the hazardous material. See paragraph (c) of § 172.313. The identification number may be displayed on the POISON GAS placard as permitted by §§ 172.332 and 172.334. When the identification number is displayed on the placard, there is no requirement to display the "INHALATION HAZARD" wording on the transport vehicle or across the center of an additional POISON GAS placard.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

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



070019

172.313(a)
172.336
172.519
172.540

January 26, 2007

Hy Yield Bromine, Inc.
4310 National Guard Dr.
Plant City, Fl. 33563-1112

§172.313

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§172.519
§172.540
Placarding
07-0019

Mr. Edward Mazzullo
Director, Office of Hazardous Material Standards
USDOT/PHMSA (PHH-10)
400 7th Street S.W.
Washington, DC. 20590-0001

Dear Sir;

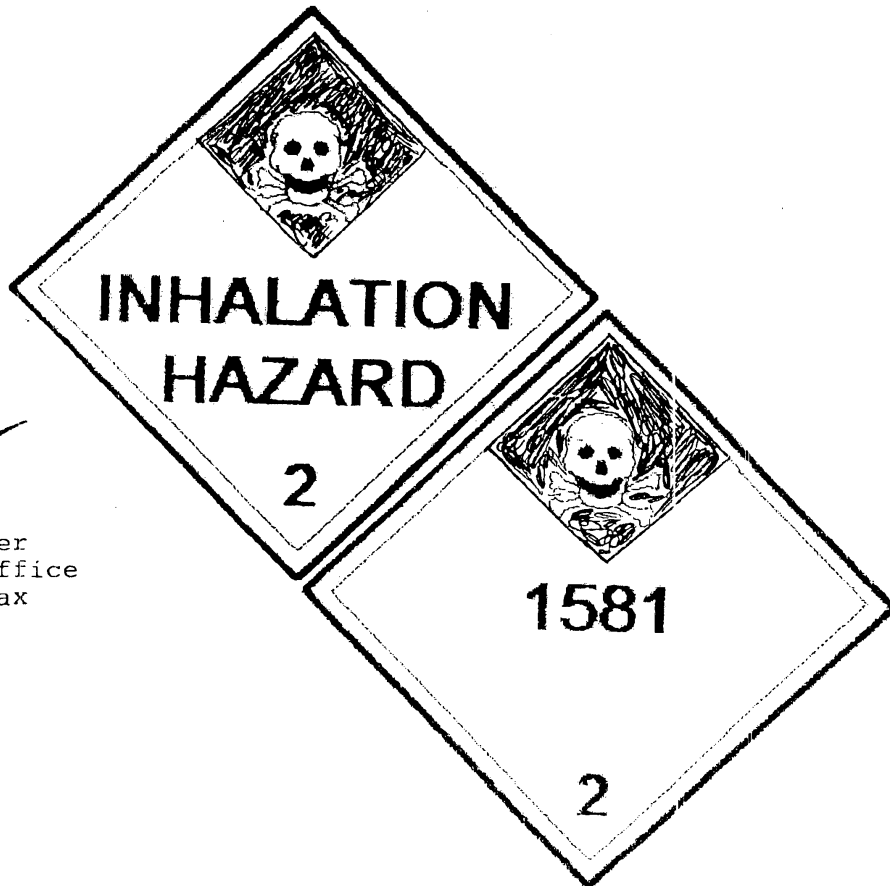
Am writing this letter in response to a telephone conversation yesterday (1-25-07) with Cameron Satterthwaite, of your office.

We are transporting Table 1 (Packing group I Zone B) materials in van trailers and on flatbeds.

Example: UN1581 (Methyl Bromide and Chloropicrin mixes)
Quantities up to 31,500 pounds.

These are poison inhalation hazard materials

Is it necessary to display the (" INHALATION HAZARD ") worded placard as well as the (1581) placard



Byver Daniell

Byver Daniell
Operations Manager
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1-813-754-8095 Fax