



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

1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

APR 27 2007

Ms. Tracey G. Smith
PCS Sales, (USA) Inc.
1101 Skokie Boulevard, Suite 400
Northbrook, IL 60062

Ref. No.: 07-0071

Dear Ms. Smith:

This is in response to your March 29, 2007 letter regarding placarding requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask where on a transport vehicle a subsidiary hazard placard must be placed in relation to the primary hazard class placard with which it is associated.

The HMR do not specify where the subsidiary hazard class placard must be placed in relation to the primary hazard class placard (i.e., above, below, to the left or right). Subsidiary hazard placards, when required under § 172.505, must be placed on each side and each end of the transport vehicle, freight container, portable tank, unit load device, or rail car. In addition, the requirements for visibility and display of placards in § 172.516 apply to placards representing both primary hazards and subsidiary hazards.

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

Sincerely,

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



070071

172.505
172.516

Pollack
\$172.505
Placarding
07-0071

Jarman, Erin <PHMSA>

From: HMIS <PHMSA>
Sent: Friday, March 30, 2007 9:59 AM
To: INFOCNTR <PHMSA>
Cc: Mannion, Doreen <PHMSA>
Subject: FW: Request for Formal Interpretation

From: TGSmith@potashcorp.com [mailto:TGSmith@potashcorp.com]
Sent: Thursday, March 29, 2007 3:13 PM
To: HMIS <PHMSA>
Subject: Request for Formal Interpretation

I am requesting a formal interpretation on the placement of placards for hazardous materials with subsidiary hazards. i.e. Does the primary hazard placard have to be placed to the far left so the placards are read from left to right when they are placed horizontally? If the Placards are placed in a diamond pattern for example

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2 3 which position should the primary hazard be placed and where should the placement of the
subsidary hazard be placed in relation the primary
4 placard.

Tracey G. Smith
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