



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

JAN 31 2006

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

Mr. John Shimer  
Director of Safety and Training  
Indiana Propane Gas Association  
101 W Washington Street, Suite 805 E  
Indianapolis, IN 46204

Reference: 05-023

Dear Mr. Shimer:

This is in response to your September 19, 2005, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-185). Specifically, you ask for clarification on the proper placement of placards on propane bobtails and gasoline/fuel oil delivery straight trucks.

Section 172.516(a) states that each placard on a motor vehicle and each placard on a rail car must be clearly visible from the direction it faces, except from the direction of another transport vehicle or rail car to which the motor vehicle or rail car is coupled. Therefore, a propane bobtail is required to be placarded on each side and each end. However, if the required placard on the front of the tank is not visible from the direction it faces, the required placard must be displayed in a visible location on the front of the motor vehicle. In the case of gasoline fuel oil delivery straight trucks, the required placard must be displayed on each side and each end. However, the placard on the tank is not required to be visible from the direction it faces when coupled to another transport vehicle, rail car, or motor vehicle.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

Charles E. Betts  
Senior Transportation Specialist  
Office of Hazardous Materials Standards



050233

172.328a(3)

**Drakeford, Carolyn <PHMSA>**

**From:** Mitchell, Hattie <PHMSA>  
**Sent:** Wednesday, September 21, 2005 1:28 PM  
**To:** Drakeford, Carolyn <PHMSA>  
**Subject:** FW: Placard placement - Interp request -

BAH-  
 §172.328 a(3)  
 Placarding  
 05-0233

Carolyn, please log in interp request below from John Shimer.

Thanks.  
 Hattie

-----Original Message-----

**From:** Mehta, Anil <PHMSA>  
**Sent:** Monday, September 19, 2005 8:57 AM  
**To:** Mitchell, Hattie <PHMSA>  
**Subject:** FW: Placard placement

Hattie; I received an inquiry on placement of placards (please scroll down). Can you please direct it to someone for response within your office or let me know who to follow up with. Thanks.  
 Mehta, Attorney02/366-7041 Fax

anil.mehta@dot.gov This email may contain material that is confidential, privileged, and/or attorney work product for the sole use of the intended recipient. Any review prohibited. Public availability is to be determined pursuant to 5 USC 552 (FOIA).

-----Original Message-----

**From:** John Shimer [mailto:jshimer@ipca.org]  
**Sent:** Friday, September 16, 2005 5:09 PM  
**To:** Mehta, Anil <PHMSA>  
**Subject:** Placard placement

We are struggling over the issue of the placement of placards on a Propane Bobtail delivery truck. Or for that matter on a Gasoline or Fuel Oil delivery Straight Truck.

I have talked with inspection personnel and they have indicated that the correct placement is one on the front of the truck (front bumper or grill area) and one each on the sides and back of the Propane barrel (Tank).

Most placards on Propane Bobtails are currently on the front of the barrel and the other 3 are on the sides and back of the barrel (Tank).

CFR 49, 172.328 a (3), (ii) further confuses the issues because it appears to indicate that proper placement is on the Barrel (tank).

We have 2 manufacturers of CTMV's in Indiana and they are placing the placards on the barrel (tank), front, sides and rear, as they come off of the assembly line.


Can you or some on there provide written verification of the proper placement of the placards on Propane Bobtails (or Gasoline or Fuel Oil delivery Straight Trucks)?


Upon receipt we will publish the verification and I will personally notify the manufacturers of CTMV's in Indiana as well as the owners of Propane (as well as Gasoline or Fuel Oil delivery Straight Trucks) CTMV's.


Please advise,  
 John Shimer

**John**


John Shimer  
Indiana Petroleum Marketers and C Store Association  
Indiana Propane Gas Association  
Indiana Fuel Oil Marketers  
Director of Safety and Training

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