



U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety
Administration

1200 New Jersey Avenue, SE
Washington, DC 20590

JUN 20 2017

Ms. Erin N. Jarman
Environmental Scientist
AECOM
1600 Perimeter Park Drive
Morrisville, NC 27560

Reference No. 16-0197

Dear Ms. Jarman:

This letter is in response to your December 12, 2016, email and attached letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to marking and placarding of multi-compartment cargo tanks.

You describe the following scenario:

- A four-compartment cargo tank contains two different hazardous materials.
- Compartments 1 and 2 contain UN1760, Corrosive liquid n.o.s.
- Compartments 3 and 4 contain UN3264, Corrosive liquid, acidic, inorganic, n.o.s.
- The sides of each of the four compartments are placarded with a Class 8 (corrosive) placard and marked with the applicable identification number for the hazardous material contained within.

You ask if the HMR permit the display of one Class 8 (UN1760) placard and one Class 8 (UN3264) placard when placarding the front and rear of the multi-compartment cargo tank if those two placards and identification numbers are representative of the materials contained in the cargo tank compartments.

The HMR permit the display you describe, provided the front and rear placards represent the two different substances contained in the four compartments of the cargo tank. It is not necessary to display all four placards on the front and rear of the cargo tank under these circumstances. I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Stevens
172.504
Placarding
16-0197

Goodall, Shante CTR (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Tuesday, December 13, 2016 9:52 AM
To: Hazmat Interps
Subject: FW: Request for Formal Interpretation
Attachments: Placarding Multi Compartment Tank Trucks.pdf

Hi Shante/Alice,

Please submit this as a letter of interpretation. Please let me know if you have any questions.

Thank you,
Jordan

From: Jarman, Erin [<mailto:erin.jarman@aecom.com>]
Sent: Monday, December 12, 2016 2:33 PM
To: PHMSA HM InfoCenter
Subject: Request for Formal Interpretation

Dear Info Center,

Attached is a formal request for interpretation related to the placarding of a multi-compartment tank truck. Thank you in advance for processing this. Please let me know if you have any questions.

Erin N. Jarman
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December 12, 2016

Mr. Charles Betts, Director
Office of Hazardous Material Standards
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave, SE
East Building, 2nd Floor
Washington, DC 20590-0001

Dear Mr. Betts:

I am writing to you for clarification concerning the placarding of multi-compartment cargo tanks containing two different hazardous materials.

Specifically, a four compartment cargo tank contains the following:

Compartments 1 and 2: "UN1760, Corrosive liquid n.o.s., 8"

Compartments 3 and 4: "UN3264, Corrosive liquid, acidic, inorganic, n.o.s., 8"

The sides of each of the four compartments are placarded with a Class 8 corrosive placard and are marked with the applicable UN number for the hazardous material that is contained in that specific compartment. When placarding the front and rear of the multi-compartment cargo tank, is it permissible to have just one Class 8 (UN1760) placard and one Class 8 (UN3264) placard since those two placards and UN numbers are representative of the materials that are contained in all four compartments of the cargo tank? It is our opinion that this approach would be acceptable and that it would not be in conflict with the placarding requirements in 49 CFR §172.504 or the bulk package marking requirements in 49 CFR §172.328.

Thank you in advance for your assistance in clarifying this question.

Sincerely,

Erin N. Jarman
Environmental Scientist
AECOM