

Transportation/Hazardous Materials: U.S. Pipeline and Hazardous Materials Safety Administration Addresses Placarding Applicable to Frac Sand



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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in a January 9th letter an issue arising out of the Hazardous Materials Regulations ("HMR") involving placarding.

PHMSA was responding to a September 23, 2019, letter from Mr. Ray Miller of McAnally Wilkins Inc. ("Wilkins").

Wilkins stated that a common industry practice involving the transportation of frac sand was to designate shipping containers with a solid colored square that communicates the grade of sand only. It was further stated that such squares come in various solid colors (e.g., blue, red, etc.). Further, they are stated to not communicate hazardous classifications (e.g., Class 3 "Flammable Liquid" or Class 4 "Dangerous When Wet").

Wilkins sought confirmation that:

- colored squares alone are not prohibited by § 172.502(a)(2);
- the vehicles are not subject to the HMR since they do not transport any hazardous materials, specification packages, or provide any hazard communication.

The PHMSA agrees. It states that:

. . . based on the photographs you provided, the solid colored squares would not be prohibited by the HMR. Although they have similar colors to placards subject to the HMR, the square display (i.e., not "square-on-point") and lack of content is different from the hazardous materials placard and would not be confused with prescribed placards in the HMR.

A copy of the letter can be downloaded [here](#).