

*The International
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DOT Hazardous Materials Placarding

Questions & Answers

Is an offeror required to verify that the carrier's vehicle is properly placarded prior to leaving the offeror's facility?

The answer is no. Under § 172.506, it is the offeror's responsibility to furnish placards to the carrier and then it is the motor carrier's responsibility to affix those placards or, if other hazardous materials are already on the motor vehicle, the placards required by Part 172, Subpart F.

When must a vehicle that is in the process of being loaded be placarded?

The HMR do not require that a transport vehicle being loaded at a facility be placarded as soon as the threshold for placarding is reached. A shipper or carrier cannot reasonably be expected to determine the appropriate placards that must be displayed on a transport vehicle until the loading or unloading process is completed. Also, it is not practical for a carrier to constantly change placards on a transport vehicle as different hazardous materials are loaded onto or unloaded from the transport vehicle.

The transport vehicle must be placarded at the time of movement of the vehicle. The "offering" for transportation referred to in 49 CFR 172.506(a) does not occur until the loading is completed. Similarly, until the loading is completed, the motor carrier has not begun "transporting" the hazardous materials within the meaning of Section 172.506(a)(1).

Under § 172.506(a), each person offering a motor carrier a hazardous material for transportation shall provide to the motor carrier the required placards for the material being offered prior to or at the same time the material is offered for transportation. In addition, no motor carrier may transport a hazardous material in a motor vehicle, unless the placards required for the hazardous material are affixed thereto. At any time prior to the vehicle entering onto a road accessible by the public, the offeror has the opportunity to offer the required placards and the carrier has the opportunity to apply them.

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Questions & Answers *Continued*

Must placarding remain on a transport vehicle after transportation is completed?

The Occupational Safety and Health Administration (OSHA) of the Department of Labor under 29 CFR 1910.1201 requires any employer who receives a package, freight container, rail freight car, motor vehicle or transport vehicle of hazardous material which is required to be marked, labeled or placarded in accordance with the HMR to retain those markings, labels and placards on the package, container or vehicle until the hazardous material is sufficiently removed to prevent any potential hazard.

Therefore, under the OSHA requirements a trailer which is received at a facility containing a quantity of hazmat which requires placards must continue to display placards as long as there is a placardable quantity in it.

A transport vehicle is loaded with 1,200 kg of Class 3 flammable liquids; 200 kg Division 6.1 poison material (not an inhalation hazard); and 300 kg Class 8 corrosive material. There are no subsidiary hazard classes. What, if any, placarding is required?

Placards are required because the aggregate gross weight (1,700 kg) of the Class 3, Division 6.1, and Class 8 hazardous materials exceeds 454 kg (1,001 lb). As provided in §172.504(b), the DANGEROUS placard may be substituted for the POISON AND CORROSIVE placards. The FLAMMABLE LIQUID placard must be used for the Class 3 material since it exceeds 1,000 kg (2,205 lb) loaded at one facility.

A transport vehicle or freight container is loaded with 300 kg Division 6.1 poison material (not an inhalation hazard); 200 kg Class 3 flammable liquid; and 100 kg Class 8 material.

The DANGEROUS placard may be used to cover all three Table 2 hazardous materials. Alternately, POISON, FLAMMABLE and CORROSIVE placards may be used.

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DOT Hazardous Materials Placarding

Questions & Answers *Continued*

A transport vehicle or freight container is loaded with 50 kg Division 6.1 poison material (not an inhalation hazard); 200 kg Class 3 flammable liquid; and 100 kg Class 8 corrosive material. Are placards required?

The answer is no. Since the aggregate gross weight of all three Table 2 materials is less than 454 kg (1,001 lb), no placards are required.

A transport vehicle or freight container is loaded with 1,200 (exceeds 2,205 lb) Class 3 flammable liquid; and 200 kg Division 6.1 poison material (not an inhalation hazard). Is the Class 3 FLAMMABLE LIQUID the only placard required?

The answer is no. The FLAMMABLE LIQUID placard is required because 1,000 kg of Class 3 material has been loaded at one facility. However, because the entire aggregate gross weight of hazardous materials on the transport vehicle exceeds 454 kg, either the DANGEROUS placard or POISON placard must be used for the Division 6.1 material.

Is it permissible to display a COMBUSTIBLE placard with the identification (ID) number 1993, a CORROSIVE placard and a DANGEROUS placard on a transport vehicle containing 10,400 pounds of non-bulk packagings containing combustible liquids and 90 pounds of a Class 8 material in non-bulk packagings?

The answer is yes. A COMBUSTIBLE placard is not required for combustible liquids in non-bulk packagings (§ 172.500 (b)(6)). However, a placard may be displayed for a hazardous material, even when not required, provided the placarding is carried out in conformance with Part 172, Subpart F. A shipper that offers a non-bulk shipment of a hazardous material that does not require display of the ID number may still provide a placard with the ID number displayed thereon, as long as the ID number is representative of the material being shipped.