



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

FEB 01 2012

Mr. Gerald A. Krisa
Vice President of Safety
R & L Carriers, Inc.
P.O. Box 271
Wilmington, OH 45177

Ref. No. 11-0283

Dear Mr. Krisa:

This responds to your October 10, 2011 letter regarding the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and the International Maritime Dangerous Goods Code (IMDG). Specifically, you ask if a corrosive placard conforming to the specifications of the IMDG Code may be used for transportation of hazardous materials solely within the United States.

The answer is yes, provided all or part of the movement is by vessel. Section 171.25(a) states that a hazardous material may be offered for transportation or transported to, from or within the United States by vessel, and by motor carrier and rail in accordance with the IMDG Code, as authorized in § 171.22, provided all or part of the movement is by vessel. Further, § 172.502(b), which pertains to permissive placarding, excepts placards that conform to the IMDG Code from the prohibited placarding specified in § 172.502(a).

Recently we were made aware that the requirement for all or part of the movement to be by vessel may impede shipments of hazardous materials that originate from foreign countries. We intend to address this issue in a future rulemaking.

I hope this information is helpful. If you have further questions, please contact this office.

Sincerely,

Ben Supko
Acting Chief, Standards Development
Office of Hazardous Materials Standards

October 10, 2011.

Mr. Charles E. Betts
Director, Office of Hazardous Materials Standards
U.S. DOT/ PHMSA (PHH-10)
1200 New Jersey Avenue, SE East Building, 2nd Floor
Washington, DC 20590

Winter
§ 172.519
Placarding
11-0283

Dear Mr. Betts,

RE: International Maritime Dangerous Goods (IMDG) Corrosive Placard

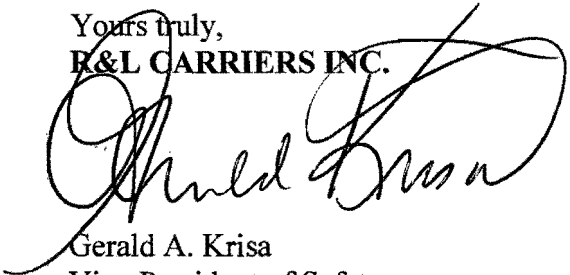
We are writing to you for clarification on the use of the IMDG Corrosive Placard when there is a shipment of fully regulated corrosive material requiring placards that is strictly in a domestic mode of transportation.

It is noted that in section CFR 49 172.519, General specifications for placards, (b)(3); "for other than Class 7 or the Dangerous placard, text indicating a hazard (for example, "Flammable") is not required. Text may be omitted from the OXYGEN placard only if the specific identification number is displayed on the placard."

It is our opinion that this allows a carrier to utilize the IMDG Corrosive Placard when required in a domestic shipment of a corrosive material. Kindly clarify this for our compliance.

Thank you for your time in reviewing this clarification on the use of the IMDG Corrosive Placard in the domestic mode of transportation.

Yours truly,
R&L CARRIERS INC.


Gerald A. Krisa
Vice-President of Safety

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