



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

August 29, 2024

Mr. Michael Atkinson
Editor-Hazardous Materials Trans
J. J. Keller & Associates, Inc.
P.O. Box 368
Neenah, WI 54957-0368

Reference No. 24-0056

Dear Mr. Atkinson:

This letter is in response to your June 19, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the visibility and display of placards. Specifically, you ask whether a placard holder that your company produces would be considered similar to the recommended placard holder displayed in Appendix C to Part 172 based on drawings you have provided of the holder. You state that you have received feedback from customers who used a previously produced placard holder that the placards would get stuck and would be ripped, torn, or bent—rendering them unusable; therefore, your company modified the placard holder to include finger indentations to allow the user to push and pull the placard with their fingers to reduce damage. You also included a picture of your proposed placard holder in use.

As stated in § 172.516(d), the means used to attach a placard may not obscure any part of its surface other than the borders except for a placard holder similar to that in Appendix C to Part 172. It is the opinion of this Office that based on the picture of the placard holder you have provided (along with the drawings), the placard holder would be acceptable because it is similar to the placard holder provided in Appendix C to Part 172.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

Eamonn Patrick
Acting Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Request for Interpretation - Visibility and display of placards
Date: Wednesday, June 26, 2024 1:29:35 PM
Attachments: [image002.png](#)
[image003.png](#)
[Placard Holder LOI.pdf](#)
[Placard Holder Specifications.pdf](#)

Hi Alice,

Please see the attached interpretation request.

Let us know if you need anything,

Janaye

From: Atkinson, Michael L <MATkinson@jkkeller.com>
Sent: Wednesday, June 19, 2024 3:16 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Request for Interpretation - Visibility and display of placards

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

Attached is our request for a formal letter of interpretation regarding the visibility and display of placards.



Michael L Atkinson
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June 19, 2024

Standards and Rulemaking Division
Pipeline and Hazardous Materials Safety Administration, Attn: PHH-10
U.S. Department of Transportation
East Building
1200 New Jersey Avenue, SE
Washington, DC 20590-0001
infocntr@dot.gov

Request for Interpretation

To whom it may concern,

Pursuant to 49 CFR §105.20, this letter is being submitted by e-mail to request an interpretation of the Hazardous Materials Regulations regarding the visibility and display of placards in 49 CFR §172.516(d). Specifically, would the attached placard holder be considered “similar” to the recommended placard holder contained in Appendix C to Part 172, and therefore meet regulatory requirements?

Background

Through comments and feedback, a top issue our customers face is placards getting stuck in the placard holders. Oftentimes, the placards end up ripped, torn, or bent, rendering them unusable.

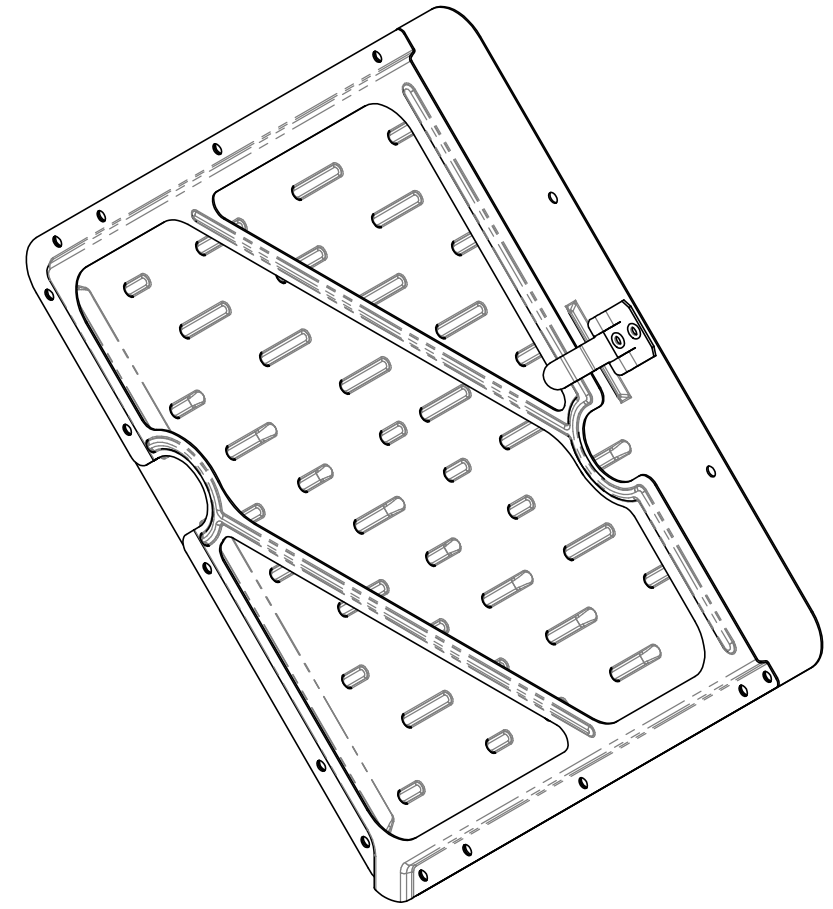
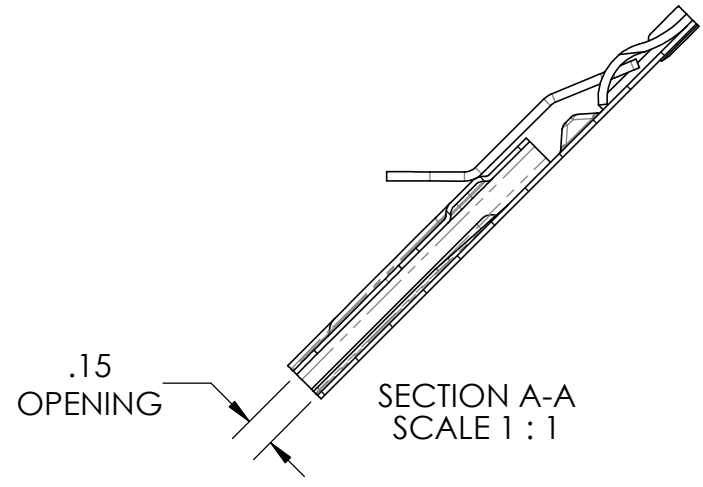
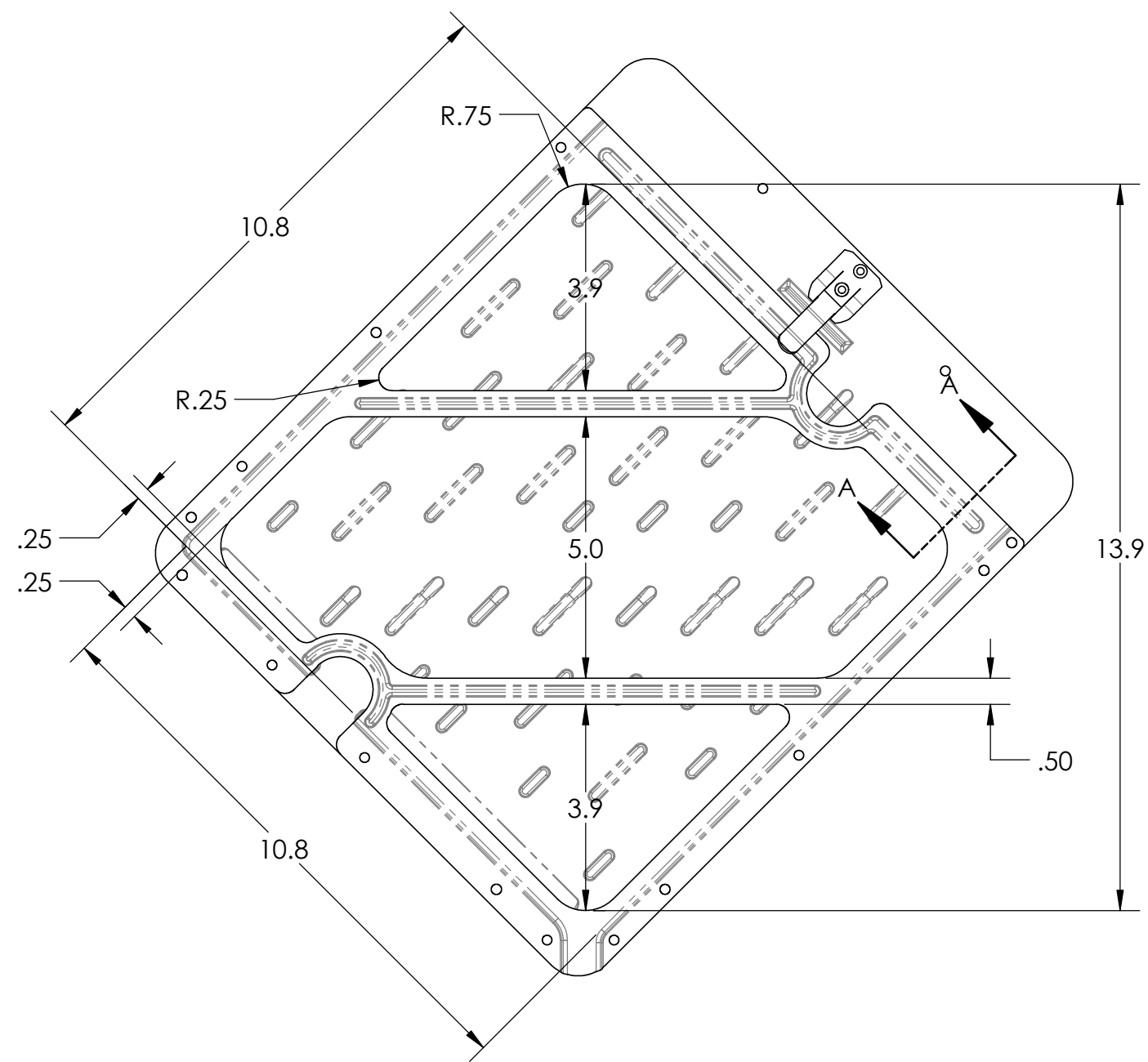
Our solution was to slightly modify the recommended placard holder to include two half-circle finger indentations that allow the user to both push and pull the placard at the same time to reduce damage.

Please see the placard holder image below and the attached placard holder specifications:



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Michael Atkinson
DOT Hazardous Materials Editor
matkinson@jjkeller.com

REVISIONS				
REV	DESCRIPTION	BY	DATE	ECN
A	INITIAL RELEASE	-	-	-



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	INTERPRET GEOMETRIC TOLERANCING PER: ANSI Y14.5-1994 THIRD ANGLE PROJECTION					
SCALE: 1:3		(DO NOT SCALE DRAWING)	SHEET 1 OF 1			