



U.S. Department  
of Transportation

Pipeline and Hazardous  
Materials Safety  
Administration

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

MAR 18 2009

Ms. Lorelei Johnson  
Transportation Specialist  
Weapons Engineering Technology (WT-DO)  
High Explosives Engineering (WT-5)  
Los Alamos National Laboratory  
P.O. Box 1663, Mail Stop C932  
Los Alamos, NM 87545

Reference No. 08-0049

Dear Ms. Johnson:

This is in response to your January 22, 2008 letter asking if a Class 1 (explosive) compatibility group letter must be displayed on an EXPLOSIVE placard when the material is transported by motor vehicle under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You note that § 172.522(b) requires the compatibility group letter for the Division 1.1, 1.2, or 1.3 (explosives) placard, but § 172.504(g) does not address transportation by motor vehicle.

The answer is no. Section 172.504(g) requires the display of the compatibility group letter on placards or labels, if appropriate (see § 172.411), for shipments of Class 1 material transported by aircraft or vessel only. If more than one compatibility group placard is required, § 172.504(g) requires only one of these placards to be displayed provided this placard conforms with the precedence requirements prescribed in paragraphs (g)(1) through (g)(4) of that section. Although the HMR does not require the compatibility group letter for motor vehicle and railcar shipments of Class 1 material, please note that § 172.502(c) permits it to be displayed provided the placards otherwise conform to the requirements prescribed in 49 CFR Part 172, Subpart F (placarding). Section 172.401(a)(2) also permits a hazard warning label to be displayed provided the label represents the hazard class of the material in the package.

I hope this satisfies your request.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



Weapons Engineering Technology (WT-DO)  
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Edmonson  
§ 172.504(g)  
§ 172.522(b)  
Placarding  
08-0049

FEB 01 2008

Date: January 22, 2008  
Refer To: WT-5-08:0005

Mr. Edward Mazzullo  
Director of the Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue  
SE Building 2<sup>nd</sup> Floor  
Washington, DC 20596

Sir,

I have a question concerning displaying the compatibility group letter on explosive placards.

172.522 (b) "The "" shall be replaced with the appropriate division number and, when required, appropriate compatibility group letter." My question is: Is the compatibility group letter required for highway transportation? 172.504 (g) does not address highway transportation.

Thank you,

Lorelei Johnson, WT-5, C932  
Transportation Specialist

LJ/jp

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WT-5 File