

# Hazardous Material Placarding Placement Reposition/Removal for Intermodal Containers

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Recommended Practice Approved By Operations Committee Members at  
GREATER FORT LAUDERDALE/BROWARD COUNTY CONVENTION CENTER,  
FORT LAUDERDALE, FL on SEPTEMBER 20, 2015



# Compliance Placement Issue

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The height and placement requirements for hazardous placarding of intermodal containers being transported via rail differs from those of intermodal containers being transported on the public roads.

The placement can create safety issues for drivers when applying/repositioning and/or removing placards so that they will be compliance with the respective rules and regulations.

# Applicable AAR and DOT Rules and/or Regulations

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The Federal Regulations, CFR 49, state the requirements regarding Hazardous Placards-Visibility and Display. Specifically:

Each placard on a motor vehicle and each placard on a rail car must be clearly visible from the direction it faces, except from the direction of another transport vehicle or rail car to which the motor vehicle or rail car is coupled.

This requirement may be met by the placards displayed on the freight containers or portable tanks loaded on a motor vehicle or rail car.

- For the complete Federal regulations see **§172.516 Visibility and display of placards.**
- For the removal/repositioning of placards see **§172.502 — Prohibited and permissive placarding**
- For applicable AAR specifications see **AAR Intermodal Interchange Rules — Section N, Rule 174.**

# AAR Specifications and DOT Regulations Differ

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The AAR Specifications are more restrictive than DOT.

- A Hazardous Material placard placement that is AAR compliant, is DOT compliant.
- A Hazardous Material placard placement that is DOT compliant, may NOT be AAR compliant.
- A Hazardous Material placard on an empty container must be removed prior to out-gate.

# Safety is the Underlying Issue

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- The Removal and Repositioning of the Placards Must Comply with Both DOT and AAR Rules and Regulations.
- Potential safety risk exists if driver attempts to reposition or remove placard from high position using improvised means. The safe removal and repositioning of the hazardous material placard is the underlying issue.
- Low position is about 1 foot above the bottom rail and meets DOT requirements. The low position does not comply with AAR Interchange Rules.
- Driver should be given the opportunity to have placard moved from high position to low position or from the low position to the high position depending upon the circumstances to comply and the applicable rule or regulation.
- The following recommendations outline the various options available to safely reposition and/or remove the placards in accordance with the applicable Regulations and Interchange rules
- Possible fees can be associated with the repositioning and removal.
- If hazardous materials placards are not removed or repositioned properly in accordance with the DOT Regulations the drayman does risk potential citation.

# Hazardous Placard Removal/Repositioning Process Flow

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The Process Flow Differs at Out-Gate versus In-Gate

The Task Force is Recommending the following Process Flow Options:

- Reposition of Hazardous Material Placard at Out-Gate
- Reposition/Removal of Hazardous Material Placard at In-Gate

# Reposition/Removal of Placard at Out-Gate

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- Container is removed from the double stack car with the hazardous placard in a high position (9 – 10 foot above ground).
- The driver can make delivery with the Hazardous Material placard in high position, per DOT regulations.
- Once container is empty however, placard must be removed or repositioned prior to any street movement in accordance with PHSMA 49 CFR 172.502.

# DOT Regulation for Removal and Reposition Placards When Load is Not Hazardous Material

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The Applicable DOT Regulation is: **§172.502 Prohibited and permissive placarding.**

(a) Prohibited placarding. Except as provided in paragraph (b) of this section, no person may affix or display on a packaging, freight container, unit load device, motor vehicle or rail car —

(1) Any placard described in this subpart unless —

(i) The material being offered or transported is a hazardous material;

(ii) The placard represents a hazard of the hazardous material being offered or transported; and

(iii) Any placarding conforms to the requirements of this subpart.

(2) Any sign, advertisement, slogan (such as “Drive Safely”), or device that, by its color, design, shape or content, could be confused with any placard prescribed in this subpart.

(b) Exceptions.

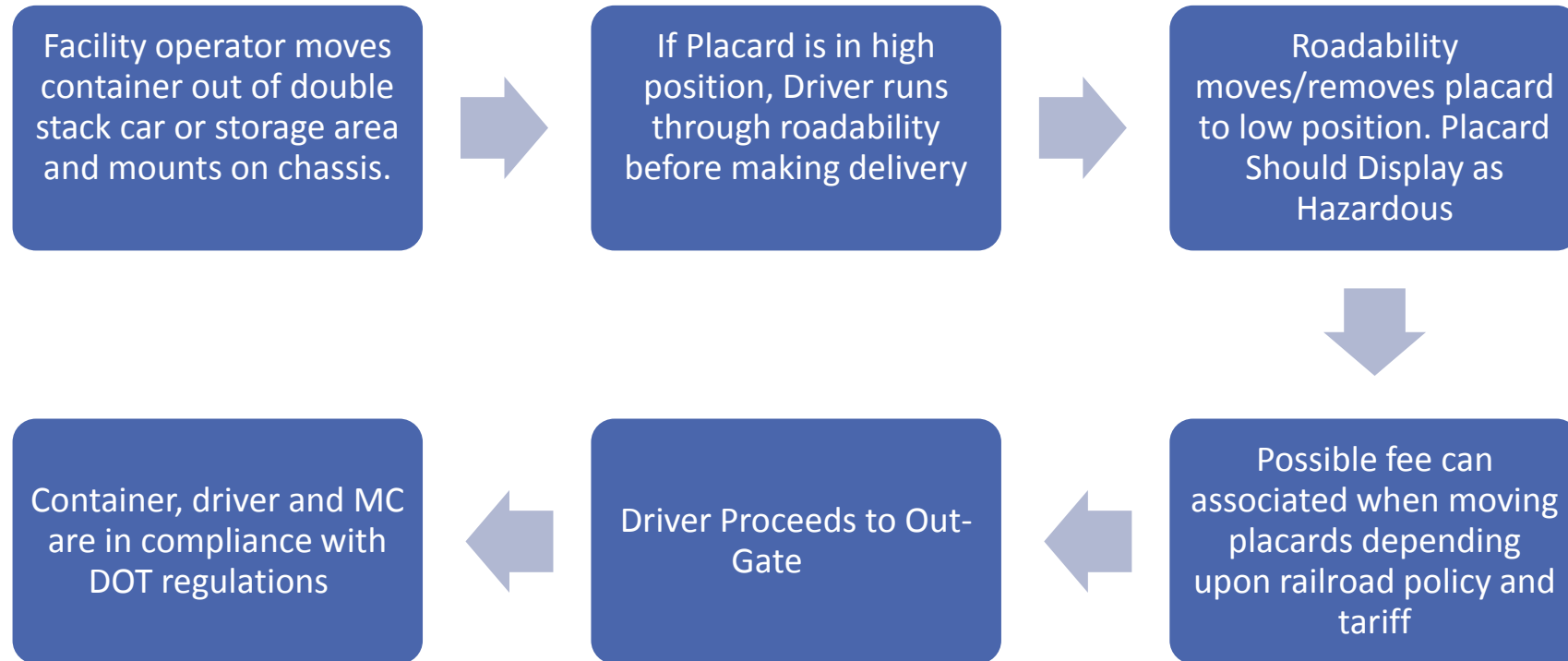
(1) The restrictions in paragraph (a) of this section do not apply to a bulk packaging, freight container, unit load device, transport vehicle or rail car which is placarded in conformance with TDG Regulations, the IMDG Code or the UN Recommendations (IBR, see §171.7 of this subchapter).

\* For the complete rule, see PHSMA 49 CFR 172.502.



# Placard Reposition – Process Flow Chart – For Hazardous Material Container – Out-Gate

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# Compliance to AAR Rules

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The Responsible Party Tendering the Container to the Railroad must be Compliant to AAR Specifications. \*

The AAR Intermodal Interchange Rules – Section N, Rule 174 applies to the location and markings of the Hazardous Material placards.

\* Please refer to each Railroad's Tariff for compliance and guidance

# AAR Intermodal Interchange Rules – Section N, Rule 174

## AAR Intermodal Interchange Rules

LOCATIONS, MARKINGS, AND AEI

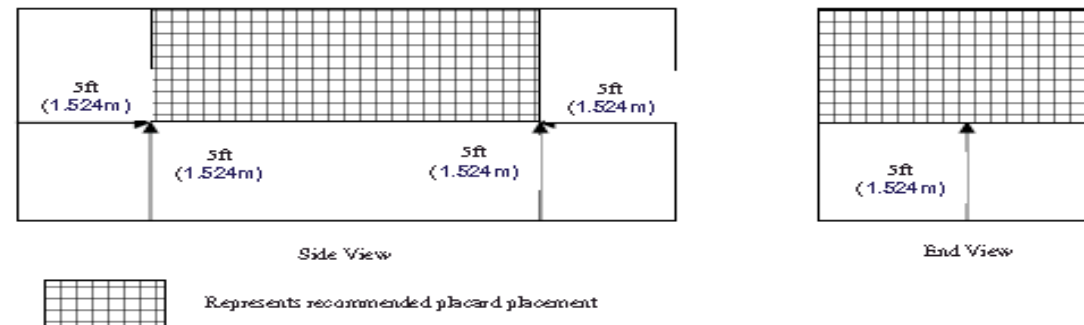
SECTION N

### 174. Hazardous Placards

Hazardous material placards must be positioned to be visible on the left and right sides and front and rear ends of containers when loaded on railcars.

- a. For the left and right sides of containers, the bottom of the placards must be positioned 5 ft above the bottom rail or 5 ft above the bottom support structure of a portable tank, and the side of the placards must be positioned 5 ft from the corner post or end support structure of a portable tank
- b. For the front and rear ends of containers, the bottom of the placards must be positioned 5 ft above the bottom rail or 5 ft above the bottom support structure of a portable tank.

**Figure 14 Placement of hazardous placards**



# Reposition/Removal of Hazardous Placard at In-Gate

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The recommended practice is for the shipper to place the placard in compliance with AAR regulations. If the Hazardous Material Placard is NOT in Compliance with AAR Intermodal Interchange Rules – Section N, Rule 174, there are Three Options Available to the Motor Carrier Driver Prior to In-Gate. They are:

(Process Flow Chart Will Follow)

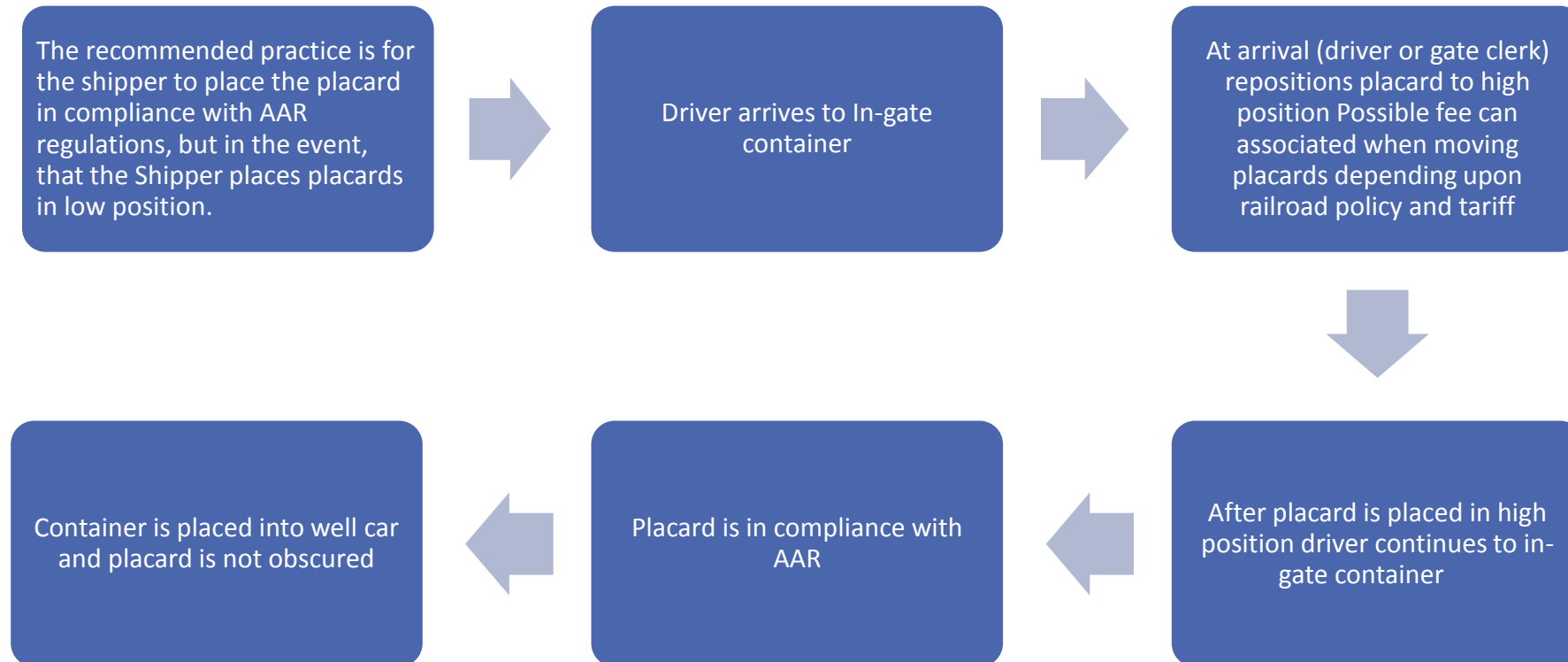
**Option One** – Facility offers Safe Area at In-Gate for Repositioning of Hazardous Material Placard

**Option Two** – Facility is Unable to Accommodate. Roadside Service Vendor is Called to Reposition Hazardous Material Placard

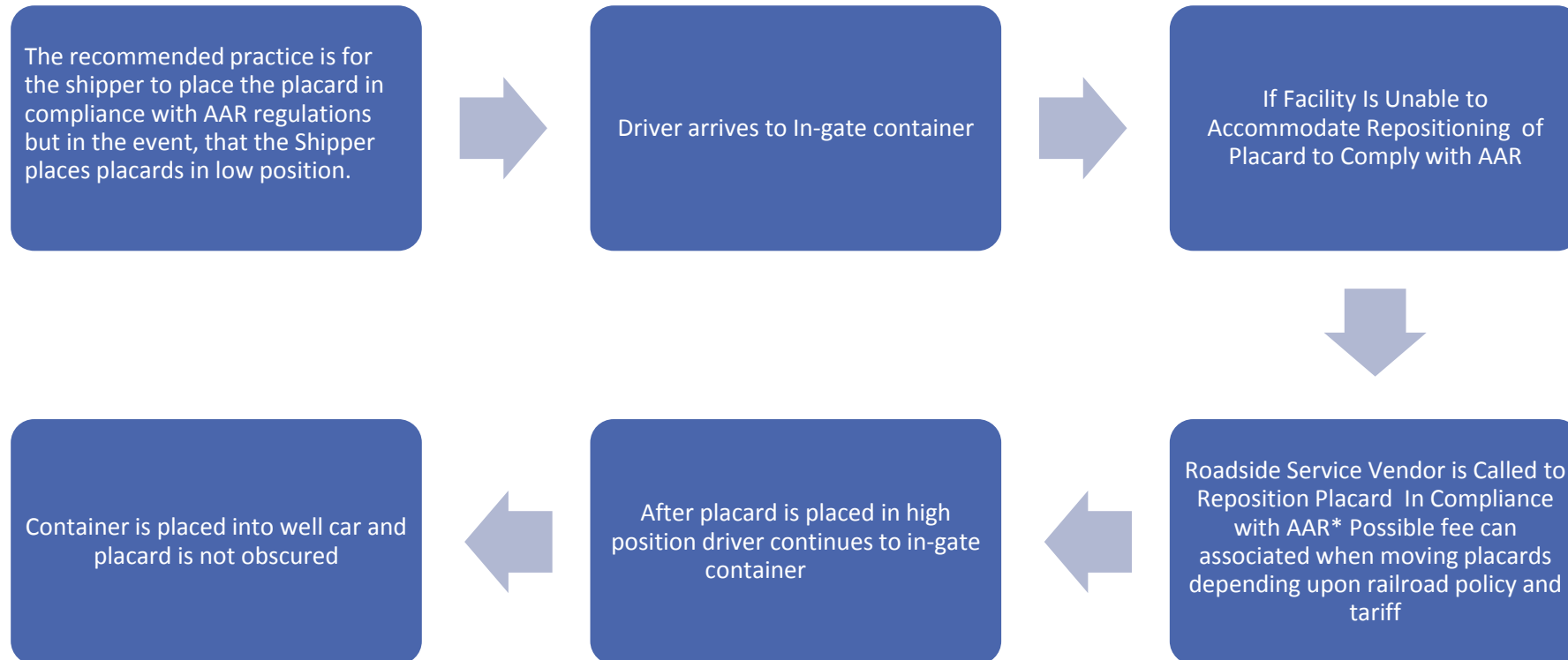
**Option Three** – Facility Directs Driver to Roadability – Post In-Gate Arrival. Roadability vendor repositions Hazardous Material Placard

\* Under the above options the reposition or removal of the Hazardous placard could be at the customer's expense in accordance with the Railroad's Tariff.

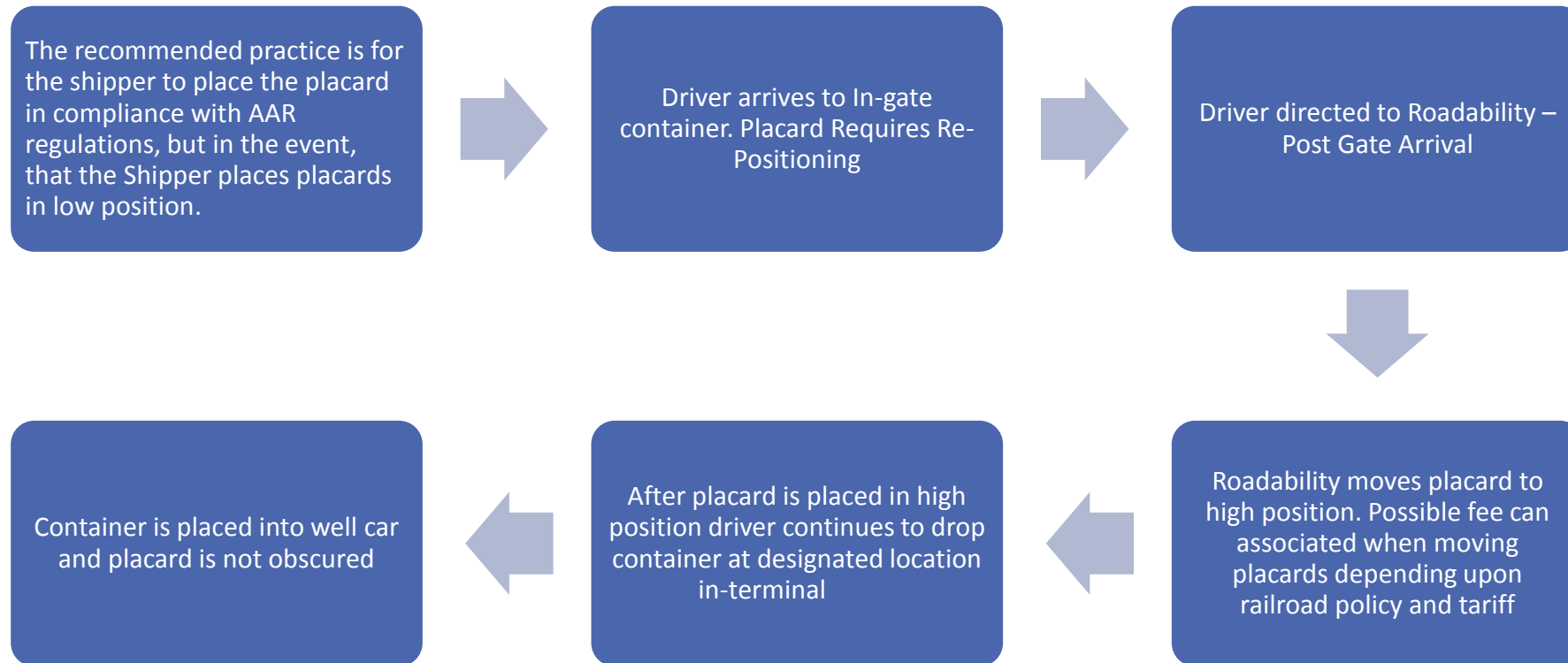
# Placard Reposition/Removal – Process Flow Chart – In-Gate – Option One



# Placard Reposition/Removal – Process Flow Chart – In-Gate – Option Two



# Placard Reposition/Removal – Process Flow Chart – In-Gate – Option Three



# Task Force Recommendation

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The Task Force has researched the various regulatory and operational requirements surrounding hazardous material placard placement and worked with numerous stakeholders to develop several options for the safe repositioning of placards as outlined in the previous flowcharts.

The Task Force recommends that the motor carrier and the facility operators agree to use one of the flow chart options/methods previously outlined.



# Recommended Practice Approved

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The Operations Committee members approved the task force recommendations on September 20, 2015 at the Operations Committee held in Fort Lauderdale, Florida at the Greater Fort Lauderdale/Broward County Convention Center.

# Appendix

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## Task Force Members

Gerry Bisailon — Union Pacific Railroad Company

Jennifer Reiser — Kansas City Southern

Thomas Ryan — CSX Intermodal Terminals, Inc.

Jason Zimmerman — Schneider