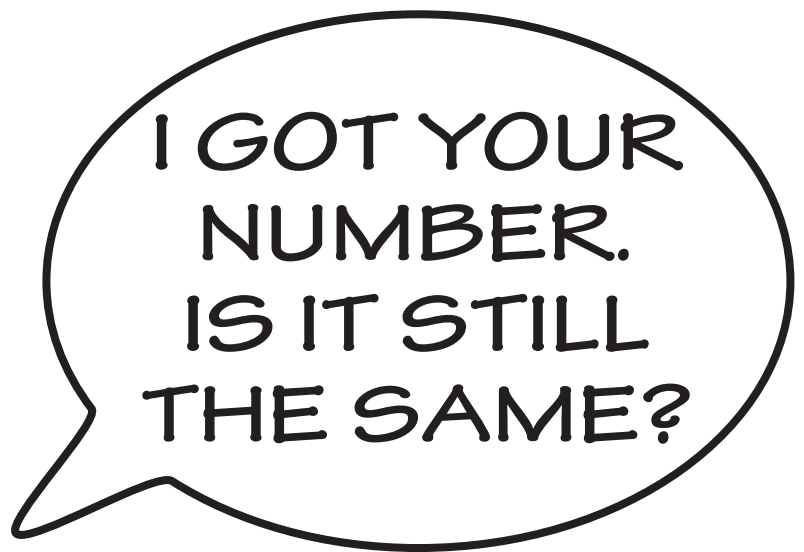


I thought borrowing a line from the Jackson Browne song, "You Love the Thunder" would be appropriate for this blog because he's the man and it is about chemicals in the same hazard class, but with different UN numbers. I had all of his cassettes when I was teenager. I will never forget the summer I "lived" in the back yard of a friend's auto body repair shop in Kutztown. I had spent the first month of that summer up in Canada, on canoe trip as a steersman, with my high school, Saint John's Cathedral Boys School in Selkirk. The trip started just south of the tar sands on the Athabasca River in Alberta and ended in Yellowknife, on Great Slave Lake in the Northwest Territories. I found out when I got back that Dad had rented my apartment while I was gone and I didn't want to pay rent for the rest of the summer, so I camped in a small 2-man tent, using the shop's bathroom to shower. I would back up my MG to the door of my tent each night, put the gear shift into reverse and use the back up lights to entertain or as a reading lamp, listening to Jackson Brown on the little white convertible's cassette player. It was the best summer of my life.



Placarding bulk and non-bulk containers of materials in the same hazard class, on the same vehicle could require two separate placards, even though the materials are in the same hazard class. I learned this after I sent out my recent blog "Dangerous, Will Robinson, Dangerous" on the DOT Dangerous placard, which I wrote to answer a customer's question on placarding mixed loads of different containers of EPA hazardous waste, which they were loading onto their trucks.

He had a bulk container, a tote of Class 8 Corrosive materials in the back of the vehicle with 6 drums of a different Corrosive material, both in the same Hazard Class, but different UN identification numbers. He knew that he had to placard because the bulk tote triggered the corrosive placard with the tote's material's UN number, under the placarding requirements in 172.504 and bulk marking requirements 172.302.

It was the drums that concerned him. He was over 1001 pounds aggregate gross weight of Table 2 non-bulk containers, so the non-bulk drums of the corrosive would trigger the corrosive placard without the UN Number, under 173.504(c). The question was, could he use the UN numbered corrosive placard with the bulk container's UN number for both the bulk and non-bulk containers of corrosives.

The answer turned out to be no. The bulk and non-bulk containers of corrosives could only share the UN numbered placards if both the bulk and non-bulk containers of corrosives share the same UN number. So it seems that the shipment of bulk and non-bulk corrosives with different UN numbers requires two corrosive placards, one for the bulk container displaying the bulk container's UN number and one without a UN Number for the Table 2 non-bulk containers of corrosives.

Some of my readers may think it is foolish of me to provide free advice to them on the hazardous material, waste, chemical and substance regulations. But I must admit it is purely selfish. In the 25 years that

I have been running seminars, I have never, ever, truly understood any government regulations by just reading or discussing it. It is only when I am forced to answer a difficult question, on a specific topic, that it really allows me understand the requirements. However, the best part of this is that sometimes by answering your specific question, it will help me understand a problem that I had with that regulation that I didn't fully understand. So don't hesitate to call or email me your questions. It might just allow me to understand that regulation a little bit more clearly. In fact, I might use your question as an example in my seminar or to explain it to someone else when they call. You've got my number. Thank you for your readership and support.

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