
E N G I N E E R I N G
M E M O R A N D U M



DATE: September 20, 2010
TO: All CrafcO Sales, PMSI, and Distributors/Dealers
FROM: Russell Cottingham
RE: Federal DOT Compliance for 3257 Marking

There has been some recent discussion and confusion regarding the DOT compliance for our melters. DOT regulations require any of our melters with a vat capacity larger than 119 gallons be labeled with a HOT 3257 MARKING. The MARKING is NOT to be considered a PLACARD; although it does follow the placard size requirements it is not a placard. We currently use black lettering on a plain white square-on-point display configuration having the same outside dimensions as a placard. All of the compliance information gathered came from Title 49 Code of Federal Regulations transportation subpart D 172.300. There are 3 subparts that will help explain the requirements and compliance needed for our melters. Subpart 172.336 outlines the identification numbers needed for display on the marking; and why our marking is not to be considered a placard. Subpart 172.325 outlines where the markings must be placed and why it must be lettered with the word "HOT". Subpart 173.29 outlines why the marking may remain displayed when the material no longer meets the definition of an elevated temperature material. Below is the subparts in their entirety for easy reference; they are current as of August 13, 2010.

49 CFR 172.336 (b) Identification numbers; special provisions

(b) Identification numbers, when required, must be displayed on either orange panels or on a plain white square-on-point display configuration having the same outside dimensions as a placard. In addition, for materials in hazard classes for which placards are specified and identification authorized for the material (see 172.334(a)), identification numbers must be displayed on orange panels or on the plain white square-on-point display configuration in association with the required placards. An identification number displayed on a white square-on-point configuration is not considered to be a placard.

49 CFR 172.325 (a) (c) Elevated temperature materials

(a) A bulk packaging containing an elevated temperature material must be marked on two opposing sides with the word "HOT" in black or white Gothic lettering on a contrasting background. The marking must be displayed on the packaging itself in black lettering on a plain white square-on-point configuration having the same outside dimensions as a placard.

49 CFR 172.325 (c) Elevated temperature materials continued

(c) If the identification number is displayed on a white square-on-point display configuration, as prescribed in 49 CFR 172.336(b), the word "HOT" may be displayed in the upper corner of the same white square-on-point display configuration. The word "HOT" must be in black letters having a height of at least 50mm (2.0 inches). Except for size, these markings shall be as illustrated for an Elevated temperature material, liquid, N.O.S.

49 CFR 173.29 (2) (g) Empty packaging

(2) Is not subject to the shipping paper requirements of this chapter when collected and transported by a contract or private carrier for reconditioning, remanufacture or reuse.

(g) A package which contains a residue of an elevated temperature material may remain marked in the same manner as when it contained a greater quantity of the material even though it no longer meets the definition for an elevated temperature material.

Further information is available online at www.ecfr.gpoaccess.gov

If you have any questions or concerns please contact me at 480-655-8333-2306 or contact the Haz.Mat. DOT. Regulations Helpline at 1-800-467-4922

Thank you for your time and understanding. Russell Cottingham