

INFORMATION BULLETIN



March 16, 2023

HAZARDOUS MATERIALS REGULATIONS APPLICABLE TO TRAP WAGONS

The purpose of this Information Bulletin (IB) is to provide information regarding the hazardous materials (HM) regulations applicable to trap wagons, as defined in Section 36016 of the California Vehicle Code (CVC).



Section 36016 CVC defines a trap wagon as a trailer or a semitrailer used exclusively in the conduct of agricultural operations to fuel, service, or repair implements of husbandry (IOH). A trap wagon may be equipped with tools, spare parts, lubricating supplies, or fuel tanks. Pursuant to Section 36005(j) CVC, a trap wagon is an IOH only if it is moved from one part of a ranch to another part of the same ranch or from one ranch to another and is only operated or moved on a highway incidental to agricultural operations. Additionally, the fuel tank or tanks cannot exceed 1,000 gallons total capacity. Pursuant to Section 36101(f) CVC, if the fuel tank or tanks exceed 1,000 gallons total capacity, but does not exceed 3,000 gallons total capacity, the trap wagon is considered a farm vehicle and is subject to the requirements of Section 36101 CVC (e.g., identification and equipment). Trap wagons which have fuel tanks in excess of 3,000 gallons are considered a trailer and would be required to be registered and equipped as such.

Typically, trap wagons contain large quantities of diesel fuel in a tank or tanks meeting the definition of a bulk package as defined in Section 171.8, Title 49 of the Code of Federal Regulations (CFR). Section 171.8, Title 49, CFR, defines, in part, a bulk package is a package in which HM is loaded with no intermediate form of containment and has a maximum capacity greater than 119 gallons as a receptacle for a liquid.



Bulk packages of diesel fuel are required to comply with all applicable HM regulations. See the following chart for applicable requirements for each type of trap wagon.

Requirement	Implement of Husbandry	Farm Vehicle	Trailer
Shipping papers	Yes	Yes	Yes
Emergency response information	Yes	Yes	Yes
Hazardous materials transportation license	No	Yes	Yes
Hazardous materials registration	No ¹	No ¹	No ¹ , unless tank capacity is ≥ 3,500 gallons
Placards	Yes (4 sides)	Yes (4 sides)	Yes (4 sides)
Identification numbers	Yes (2 opposing sides) ²	Yes (4 sides)	Yes (4 sides)
¹ Section 107.601, Title 49, CFR, exempts a farmer, as defined in Section 171.8, Title 49, CFR, from HM registration for those activities in direct support of the farmer's farming operations. ² Identification numbers are required on four sides if the tank capacity is 1,000 gallons or more.			

Both the tank and HM endorsements are not required if the driver possesses a valid HM certificate pursuant to Section 12804.2 CVC.

If the trap wagon is being moved incidental to the agricultural operations for service or maintenance, it would still meet the requirements outlined in this IB.

Questions concerning this information contained in this IB should be directed to Commercial Vehicle Section, at (916) 843-3400.

OFFICE OF THE COMMISSIONER

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