

ISSUE NUMBER

19-028-HAZ

ISSUE NAME

Placard Color Tolerance - Enforcement Guidance

STATUS

Closed

Hazardous Materials Committee

NAME

Dave Schofield

AGENCY

CRH

ADDRESS

7255 S U.S. HWY 89, P. O Box 4309
Jackson, WY 83001
United States

PHONE

3074133106

EMAILdave.schofield@na.crh.com**SUMMARY OF ISSUE**

Industry has no way to determine if a placard falls within the color tolerance chart referenced in 172.407(d)(4)(ii) and in Appendix A to Part 172.
The Pantone colors specified in 172.407(d)(5) reference making placards and colors for new placards.
The use of a Pantone color chip for enforcement does not take in to account the color tolerance allowed In Appendix A
It appears the current enforcement standard is a visual observation and determination by the inspector which is subjective standard and compliance is completely at the inspectors discretion.

JUSTIFICATION OR NEED

There needs to be an objective and understandable standard set for industry and enforcement inspectors to know what color tolerance is allowed.

REQUEST FOR ACTION

Set an objective standard for color tolerance for each placard color and develop a tolerance chart for both industry and enforcement inspectors to determine the color tolerance for compliance.

SUPPORTING DOCUMENTS/PHOTOS

- [55-803-Right-side-placards.jpg](#)
- [55-803-Left-side-placards.jpg](#)
- [Summary-of-issue-CVSA-Action-Request-Placards.pdf](#)

ACTION TAKEN BY COMMITTEE

The issue was introduced to the committee, with comments being made by Bill Quade from PHMSA. The difficulties of tolerance enforcement on placards was discussed. Due to existing regulation, enforcement of placard color tolerance in accordance with regulation would be problematic. The issue was motioned to be closed with no action.