

ISSUE NUMBER

21-001-HAZ

ISSUE NAME

OOSC, Part III, Item 2. Placarding - Misrepresenting Placard for Same Class

STATUS

Closed

Hazardous Materials Committee

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The out of service criteria is not clear on when a vehicle should be placed out of service when a placard misrepresents the hazardous material being transported. When a Class 3 flammable liquid is being transported and combustible liquid placards are being displayed, the placards misrepresent the HM/DG being transported, even though it is in the same class.

JUSTIFICATION OR NEED

The first paragraph in the Policy Statement in Part III of the out of service criteria says the following:

The purpose of this part is to provide criteria for the abatement of unsafe conditions in the transportation of HM/DG and is based upon the presence of any condition(s) that fail(s) to communicate the hazard(s) or is an imminent hazard.

A combustible placard displayed in place of a required flammable placard is a condition that fails to communicate the hazard.

Section 2 in Part III of the out of service criteria addresses placarding. It says:

Placards Displayed on a Transport Vehicle

(1) 50% or more of the required placards for a hazard class are missing.

(2) Any placard(s) misrepresent(s) the HM/DG being transported.

NOTE: For this OOS item to apply, HM/DG must be present.

Inspection Bulletin 2017-03 - Display of GHS Labels on Bulk Packages

A combustible placard displayed in place of a required flammable placard misrepresents the the HM/DG. There is no note further clarifying what is required to meet the out of service standard for "misrepresents".

This issue could also occur with other hazard classes or divisions. For example, there are 6 division of Class 1 explosives. If a Division 1.2 explosive is being transported but the transport vehicle is displaying Division 1.4 placards, would that be out of service?

REQUEST FOR ACTION

The hazmat committee needs to address this issue. If a combustible placard displayed on a vehicle requiring flammable placards does not meet the out of service standard, a note should be added to the out of service criteria to clarify this issue, as well as any other hazard classes or division where this issue could occur. A language change could also be considered in the introductory language to Part III of the out of service criteria.

SUPPORTING DOCUMENTS/PHOTOS

- [2022-06-Placards-on-Flammable-and-Combustible-Liquids-Created-12-14-2022.pdf](#)

ACTION TAKEN BY COMMITTEE

The committee discussed and created an inspection bulletin to provide guidance on the issue. Inspection Bulletin 2022-06 Placards on Flammable and Combustible Liquids was created on December 14, 2022.