



Inspection Bulletin

North American Standard Inspection Program

2022-06 – Placards on Flammable and Combustible Liquids

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Summary

This inspection bulletin provides guidance pertaining to how to properly placard a commercial motor vehicle transporting flammable and/or combustible liquids that have been properly classified on a shipping document. Specifically, this bulletin will identify when a vehicle is in violation and should be placed out of service or when a vehicle is compliant with Title 49 Code of Federal Regulations (CFR) Part 172 Subpart F.

Background

Certified commercial motor vehicle (CMV) enforcement inspectors are finding an increasing number of vehicles displaying the red-over-white combustible placard for materials that are classified on the shipping document as a flammable liquid. Examples of these materials being transported by highway include, but are not limited to, UN1203, Gasoline, Hazard Class 3, Packing Group II, and UN1267, Petroleum Crude Oil, Hazard Class 3, Packing Group II. These materials may not be reclassified in accordance with §173.120 or §173.150(f)(1) on the shipping document as a combustible liquid by the shipper. As a result, this has created inconsistencies in how the placarding regulations and out-of-service criteria are applied.

§172.502(a)(1)(ii) states that no person may affix or display on a packaging, freight container, unit load device, motor vehicle or rail car any placard described in this subpart, unless the placard represents a hazard of the hazardous material being offered or transported.

The North American Standard Out-of-Service Criteria, Part III, Item 2. Placarding, a. places transport vehicles out of service when placards displayed misrepresent the hazardous materials/dangerous goods (HM/DG) being transported.

Classification

A Class 3 flammable liquid with a flash point at or above 38 °C (100 °F) that does not meet the definition of any other hazard class may be reclassified as a combustible liquid. If a combustible liquid has been reclassified, the shipping paper must be modified as outlined in §172.101(d)(4).

Flammable placards, as provided in §172.542, and combustible placards, as provided in §172.544, are identical in design, except for the text “FLAMMABLE” or “COMBUSTIBLE.” The text for these placards is not required under §172.519(b)(3). The display of a combustible placard with a white bottom is allowed by §172.332(c)(4) for transportation of combustible liquids by highway.

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Guidance

Placards must accurately communicate the hazardous materials being transported on a commercial motor vehicle. If a hazardous material has been classified by the shipper as a flammable liquid and cannot be reclassified, the vehicle may not display a combustible placard as prescribed in §172.332(c)(4). A vehicle in this circumstance displaying a combustible placard with a white bottom should be cited with a violation under §172.502 and placed out of service.



CORRECT



CORRECT



INCORRECT

If the CMV is transporting a material that the shipper has determined is or can be reclassified as a combustible liquid and that shipper communicates that classification on the shipping document, the transport vehicle would be in compliance with the placarding requirements found in Part 172 Subpart F, if that vehicle was displaying COMBUSTIBLE placards in one of the four following ways:

1. Combustible placards displaying the word "COMBUSTIBLE" (§172.544)
NOTE: Identification numbers would be required to be displayed in accordance with §172.332(b) or §172.336(b).
2. Hazard Class 3 placards with no text
NOTE: Identification numbers would be required to be displayed in accordance with §172.332(b) or §172.336(b).
3. Hazard Class 3 placards with the represented identification number displayed across the center area of the placard in accordance with §172.332(c)
4. Combustible placards with a white bottom as prescribed by §172.332(c)(4)



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