



U.S. Department  
of Transportation

1200 New Jersey Avenue SE  
Washington, DC 20590

**Pipeline and Hazardous  
Materials Safety  
Administration**

JUL 7 2011

Jay K. Sletten  
CVI Sargent  
DataQs Administrator  
Minnesota State Patrol, District 4700  
1110 Centere Pinte Curve, Suite 410  
Mendota Heights, MN 555120

Ref. No. 11-0077

Dear Sgt. Sletten:

This responds to your March 23, 2011, request for clarification on placarding under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the enclosed photos of placards represent placards in compliance with the color tolerance requirements in the HMR.

Section 172.519 (d) requires that the background color, symbol, text, numerals and inner border on a placard must be as specified in §§ 172.521-172.560 of the HMR, as appropriate. Black and any color on a placard must be able to withstand without substantial change (1) a 72-hour fadeometer test and (2) a 30-day exposure to open weather test. Upon visual examination, color on a placard must fall within the color tolerances on the approved Hazardous Material Label and Placard Color Tolerance Chart (see §§ 172.407(d)(4)). As an alternative, the PANTONE formula guide coated/uncoated as specified for colors in § 172.407(d)(5) may be used. If you choose to use PANTONE colors, the placards must be an exact match to the color in the PANTONE formula guide coated/uncoated. Color charts conforming to Appendix A of Part 172 are on display in the Standards and Regulations Division, 1200 New Jersey Avenue, SE, Washington, DC 20590. You may also order these charts from a commercial source, Hale Color Charts, Inc., 3709 Ocean View Avenue, Los Angeles, CA 90066; or you may call them at 800-777-1225.

The fading of the color on the placards indicates the placards are not in compliance. Therefore, it is the opinion of this office that the placards in the enclosed photos are not in

compliance with the color tolerance requirements in the HMR.

I hope this answers your inquiry. If you need additional assistance, please contact this office at 202-366-8553.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Supko". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Ben Supko  
Chief, Standards Development  
Standards and Regulations Division

# MINNESOTA DEPARTMENT OF PUBLIC SAFETY



## Minnesota State Patrol-District 4700

### Commercial Vehicle Section

1110 Centre Pointe Curve Suite 410, Mendota Heights, Mn 55120  
Phone: 651/405-6196 • Fax: 651/405-6199 • TTY: 651/282-6555  
www.dps.state.mn.us/patrol/comveh/index.htm

March 23, 2011

Office of Hazardous Materials Safety  
Office of Hazardous Materials Standards  
Room 8422  
Nassif Building  
400 7<sup>th</sup> St SW  
Washington, DC 20590-0001

Boothe  
§172.517(d)  
Placarding  
11-0077

Alcohol  
and Gambling  
Enforcement

ARMER/911  
Program

Bureau of Criminal  
Apprehension

Driver  
and Vehicle  
Services

Homeland  
Security and  
Emergency  
Management

Minnesota  
State Patrol

Office of  
Communications

Office of  
Justice Programs

Office of  
Traffic Safety

State Fire Marshal  
and  
Pipeline Safety

To whom it may concern:

Enclosed are two digital photographs of a placard submitted by a motor carrier in Minnesota. The carrier's vehicle was inspected and a violation of 172.517(d) was recorded. The carrier replaced the placard, but does not feel the old placard was in violation or unserviceable.

Since we do not have a copy of the Pantone formula guide or any other guides relating to acceptable fading or discoloring of placards, I am hopeful you will provide your guidance on this matter. Is this an acceptable placard or was our inspector correct in recording it as a violation? I thank you in advance for your quick reply.

Respectfully,

Jay K. Sletten  
CVI Sergeant  
DataQs Administrator  
651-405-6198  
jay.sletten@state.mn.us





1075

2



