



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

FEB 07 2019

Patricia Carson
GATE Petroleum Company
9540 San Jose Boulevard
P.O. Box 23627
Jacksonville, FL 32241-3627

Reference No. 18-0023

Dear Ms. Carson:

This letter is in response to your February 21, 2018, email and subsequent phone conversations requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to marking and placarding of cargo tanks. You state that you typically transport “UN1203, Gasoline” and “UN1202, Fuel oil” to customers in multi-compartmented cargo tanks, but you have recently begun transporting “UN3475, Ethanol and gasoline mixture” in full loads, changing out the identification markings to UN3475. You now want to transport both UN1203 and UN3475—sometimes with or without diesel—in different compartments in the same load.

Your questions are summarized and answered as follows:

- Q1. You ask if the UN1203 identification marking supersedes all other markings for the petroleum products because it has the lowest flash point or if you must display both UN1203 and UN3475 identification markings.
- A1. In accordance with § 172.336(c), identification numbers are not required for each of the different petroleum distillate fuels in a compartmented cargo tank if the identification number for the petroleum distillate fuel with the lowest flash point is displayed. However, § 172.336(c) states that if the cargo tank also contains gasoline and alcohol fuel blends consisting of more than 10% ethanol, “UN3475” or “UN1987” must also be displayed, as appropriate.
- Q2. If “UN3475, Ethanol and gasoline mixture” and “UN1203, Gasoline” are alternated between compartments in the compartmented cargo tank, you ask if each compartment must be marked and placarded.
- A2. The answer is no. While § 172.336(c) does require that the compartmented cargo tank vehicle display the identification numbers for both UN3475 and UN1203, there is no requirement for the markings or placards to appear on each compartment.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

T. Glenn Foster
Chief, Regulatory Review and Reinvention
Standards and Rulemaking Division

Andrews,
Placarding
18-0023

January, Ikeya CTR (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Wednesday, February 21, 2018 4:51 PM
To: Hazmat Interps
Subject: FW: Interpretation Letter Request

Hello all,

Please see the below interp request. I spoke to the caller and provided her three LOI's: 06-0203, 16-0020, & 14-0178, but she is looking for an interp that fits her situation exactly. Also, she has another question:

If the if the compartmentalized cargo motor vehicle has only two products (UN3475 and UN1203), but they are alternated, does each section have to be marked/placarded, or would the two placards/marks suffice?

Regards,

-Breanna

From: Patricia Carson [mailto:pcarson@gatepetro.com]
Sent: Wednesday, February 21, 2018 12:52 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Interpretation Letter Request

U. S. DOT
Attn: PHH-10
East Building
1200 New Jersey Ave, SE.
Washington, DC 20590

To Whom It may Concern:

I work for a Hazmat fuel carrier and we are expanding the various product to which we haul. Normally we carry Gasoline (with <10% ethyl alcohol) (UN1203) and/or Fuel Oil (NA1993 or UN1202) to our customers in a multi compartmented trailer (DOT 407). We have started to carry Gasoline "E85" (with >10% ethyl alcohol) (UN3475) in full loads so we change out our placards to Flammable-UN3475.

Dispatch now wants to haul both types of Gasoline, sometimes with or without diesel, in the different compartments per load. Does the 1203 supersede all other placards because of the flashpoint or do we have to display both 1203 & 3475 placards on the sides of the trailer with the generic flammable placard on the front and back? Being that it is all Class 3, flammable liquids, I was unsure of the placard markings. Is there anything else that we need to do differently when hauling these 2 types of gasoline together on one unit?

Thank you for the opportunity to ask this question.

Pat Carson
Safety Coordinator
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