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Cargo Tank Marking/Placarding/Hazardous Materials Regulations: U.S. Pipeline and Hazardous Materials Safety Administration Addresses Ethanol/Gasoline Mixtures

05/30/2019

The United States Pipeline and Hazardous Materials Safety Administration (“PHMSA”) addressed in a February 7th letter a request for clarification of the Hazardous Materials Regulations (“HMR”) applicable to marketing and placarding of cargo tanks.

The PHMSA letter was in response to a February 21, 2018, query from GATE Petroleum Company (“GPC”) of Jacksonville Florida.

GPC informed PHMSA that it typically transports “UN1203, Gasoline” and “UN1202, Fuel oil” to customers in multi-compartmented cargo tanks. However, the company stated that it had begun transporting “UN3475, Ethanol and gasoline mixture” in full loads. Further, the company states that it had changed out the identification markings to UN3475.

GPC states that it now wants to transport both UN1203 and UN3475. However such transport would sometimes be with and other times without diesel in different compartments in the same load. As a result, the company posed the following questions to PHMSA.

Question 1: 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.

PHMSA Responded:

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.

Question 2: 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.

PHMSA Responded:

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.

A copy of the PHMSA letter can be downloaded [here](#).