



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 at the end.

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