



U.S. Department  
of Transportation

1200 New Jersey Avenue SE  
Washington, DC 20590

**Pipeline and Hazardous  
Materials Safety  
Administration**

JUN 26 2015

First Sergeant Dean Dill  
South Carolina State Transport Police  
10311 Wilson Boulevard  
Blythewood, SC 29016

Reference No. 14-0178

Dear First Sergeant Dill:

This is in response to your recent e-mail and telephone conversations with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the marking requirements for multi-compartment cargo tanks containing petroleum distillate fuels. You state you encountered a four-compartment cargo tank with all of its compartments filled with "NA 1993, Diesel fuel, 3, PG III" that was marked with the identification number for "UN 1203, Gasoline, 3, PG II." You ask if this marking is permitted.

The answer is no. The regulatory text in former § 172.336(c)(6), currently listed as the fifth item in the table under § 172.336(c) (see 78 FR 65454), permits a compartmented cargo tank loaded with more than one liquid petroleum distillate fuel to display only the identification number of the fuel with the lowest flash point being transported. In your example, all of the compartments in the cargo tank were loaded with only one petroleum distillate fuel. Therefore, it must be marked with the "NA 1993" identification number.

You also state, according to the driver of the cargo tank, the Pipeline and Hazardous Materials Safety Administration (PHMSA) stated in its Reference No. 00-0208 clarification letter that marking the vehicle with "UN 1203" is permitted when all of its compartments contain "NA 1993" diesel fuel under former § 172.336(c)(6). You ask if the driver's understanding of this letter is correct. The answer is no. The clarification letter PHMSA issued under Reference No. 00-0208 applies to a marking exception for the display of an identification number on a multi-unit cargo tank containing different as opposed to containing the same liquid petroleum distillate fuels in all of its tanks. Therefore, a multi-unit cargo tank that contains the same material, e.g., "UN 1993," in each compartment must be marked with the identification number "1993."

I hope this information satisfies your request.

Sincerely,

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

Edmanson  
§ 172.336(c)(6)  
Markings

**Dodd, Alice (PHMSA)**

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14-0178

**From:** Ciccarone, Michael CTR (PHMSA)  
**Sent:** Thursday, September 25, 2014 3:24 PM  
**To:** Hazmat Interps  
**Subject:** FW: Feedback: General Questions/Comments Regarding the PHMSA Enforcement Program

Shante and Alice,

Please submit this for a formal letter of interpretation. Mr. Dill spoke with Shelby in the HMIC and Eileen in PHH-12.

Thanks,

Mike

-----Original Message-----

**From:** PHMSA Webmaster  
**Sent:** Wednesday, September 24, 2014 12:29 PM  
**To:** HM-Enforcement (PHMSA); PHMSA Webmaster  
**Subject:** Feedback: General Questions/Comments Regarding the PHMSA Enforcement Program

I have a question regarding the marking of cargo tanks hauling liquid petroleum distillate fuels. The regulations clearly state that if hauling multiple liquid petroleum distillate fuels the ID number with the lowest flash point may be displayed. If a vehicle is hauling only diesel fuel may it continue to display ID Number 1203 (Gasoline). We have located an interpretation (Ref. No.00-0208) from 2000 which advises this practice is acceptable. Please advise if this interpretation is still correct and should be followed. Also please send me a copy of this interpretation if possible, I was unable to locate it on your website.  
Thanks for your help concerning this matter.

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