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SUBJECT: *U.S. DOT Placards*

ISSUE: *Proper Placards for Split Loads of Gasoline and Diesel Fuel or Heating Oil*

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DATE: *July 16, 2015*

PROPER PLACARDING FOR SPLIT LOADS OF GASOLINE AND DIESEL FUEL OR HEATING OIL:

There have been numerous inquiries to PMAA about a recent [letter](#) from the U.S. DOT's Pipeline and Hazardous Material Safety Administration (PHMSA) explaining the marking exemption under 49 CFR 172.336(c) that allows operators of cargo tank shipments of gasoline and diesel fuel to placard the lowest flashpoint. The letter is not a new interpretation of the exemption but simply a written response to an inquiry from a local enforcement official. The letter explains that the only time an operator can placard a cargo tank vehicle to the lowest flash point is when both gasoline and petroleum distillates such as diesel fuel and heating oil are shipped *simultaneously* in a split load in separate compartments of the same cargo tank vehicle. The exemption *does not* apply to alternating straight loads of gasoline or diesel fuel shipped in separate delivery runs but in the same cargo tank vehicle. The letter reflects the plain language of PHMSA regulations as adopted in 2008 and is not subject to interpretation. PMAA sent out a notice of the change at the time it was announced back in 2008.

Confusion has arisen because PHMSA regulations at one time allowed operators to placard to the lowest flashpoint of gasoline (UN 1203) for straight loads of either gasoline or diesel fuel or heating oil (NA 1993). Thus, drivers were not required to change the UN 1203 placard at the terminal when switching loads from gasoline to diesel fuel or heating oil. The reason PHMSA allowed this exemption is because gasoline and diesel fuel emergency response procedures at the time were identical for both. However, with the advent of ethanol and biodiesel blends in motor fuels, emergency response procedures sometimes differ based on the content of the renewable fuel in the blend. As a result, in a 2008 rulemaking, PHMSA adopted the following placarding exemption and proper shipping names to address this difference:

Compliance:

Placards

- Placarding to the Lowest Flashpoint: Split loads of gasoline AND diesel fuel or heating oil in separate compartments of the SAME cargo tank shipment may be placarded to the lowest flash point (UN 1203).

- Straight loads of gasoline and diesel fuel shipped in alternating delivery runs must be placarded with the identification number associated with the fuel being shipped: either UN 1203 for gasoline or UN 1993 or UN 1202 for diesel fuel.

Proper Hazardous Material Shipping Names

- **Diesel Fuel**

NA1993, Diesel Fuel
UN1202, Diesel Fuel

- **Fuel Oil**

NA 1993, Fuel Oil
UN 1202, Diesel Fuel

- **Biodiesel blends up to B-5**

NA 1993, Diesel Fuel
UN 1202, Diesel Fuel
UN 1202, Gas Oil

- **Biodiesel Blends over B-5**

NA 1993, Diesel Fuel Solution
UN 1202, Diesel Fuel Solution
UN 1202, Gas Oil Solution

- **Ethanol Blends up to E-10:**

UN 1203, Gasoline

- **Ethanol Blends over E-10 and up to E-20**

UN 3475, Ethanol and Gasoline Mixture

- **E-85 Ethanol Blends**

UN 3475, Ethanol and Gasoline Mixture

- **Alcohol with up to 5% Gasoline Content**

UN 1987, Alcohols
NA 1987, Denatured Alcohol
UN 3475, Ethanol and Gasoline Mixture, 3, PG II

Contact Mark S. Morgan, PMAA Regulatory Counsel at mmorgan@pmaa.org for questions or additional information.