



STATE OF TENNESSEE  
DEPARTMENT OF TRANSPORTATION  
ENVIRONMENTAL DIVISION  
SUITE 900 - JAMES K. POLK BUILDING  
505 DEADERICK STREET  
NASHVILLE, TENNESSEE 37243-0334

## MEMORANDUM

**To:** Region, District, and County Managers

**From:** Ronnie Bowers

**Date:** February 27, 2006

**Subject:** Required Marking and Labeling of Portable Fuel Tanks

Due to a question asked of my office recently, it has come to my attention that the portable fuel tanks that TDOT uses are required to be properly marked and labeled in accordance with requirements set forth by the Tennessee Occupational Safety and Health Administration (TOSHA). According to TOSHA rules, TDOT must comply with the hazard communication requirements of the Occupational Safety and Health Act (OSHA) of 1970. The hazard communication standards of OSHA require that containers of hazardous chemicals in the workplace be labeled with the following information: (1) the name of the hazardous chemical, and (2) appropriate hazard warnings associated with the hazardous chemical.

The portable fuel tanks that must comply with these requirements include the pickup truck bed mounted tanks that typically range from 55- to 110-gallons and also any larger mobile fuel tanks. Most of these tanks contain diesel, which is a hazardous chemical by definition because it is a combustible liquid, but some tanks may contain gasoline, which is also a hazardous chemical by definition because it is a flammable liquid. In order to appropriately label these portable fuel tanks, a National Fire Protection Association (NFPA) label and a label naming the contents of the tank, either "Diesel" or "Gasoline" depending on the tank, will need to be affixed to each such fuel tank.

The NFPA label utilizes the highly visible multi-colored diamond-shaped label depicted below, with each color representing a type of hazard. Each of the smaller single-color diamonds, except for the white one, will also contain a number ranging from 0 to 4. These numbers represent the severity of the hazard posed by the tank/container contents. The number "0" represents no hazard, while the number "4" represents the greatest hazard.

FIRE HAZARD

- 4 - Very Flammable
- 3 - Readily Ignitable
- 2 - Ignited with Heat
- 1 - Combustible
- 0 - Will not Burn

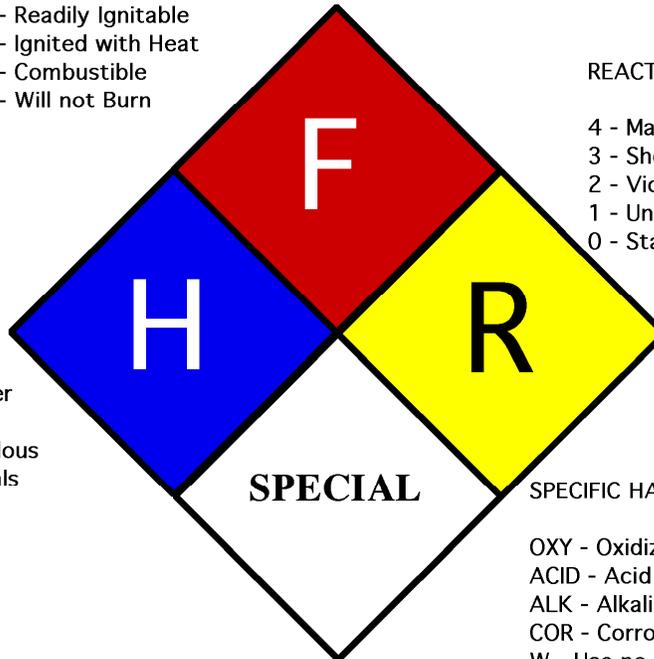
# NFPA 704M LABEL

REACTIVITY HAZARD

- 4 - May Detonate
- 3 - Shock & Heat May Detonate
- 2 - Violent Chemical Change
- 1 - Unstable if Heated
- 0 - Stable

HEALTH HAZARD

- 4 - Deadly
- 3 - Extreme Danger
- 2 - Hazardous
- 1 - Slightly Hazardous
- 0 - Normal Materials



SPECIFIC HAZARD

- OXY - Oxidizer
- ACID - Acid
- ALK - Alkali
- COR - Corrosive
- ~~W~~ - Use no Water

Using the NFPA system, the label for diesel fuel will have a “0” in the blue section for health, a “2” in the red section for flammability, a “0” in the yellow section for reactivity, and the white section will be blank since there are no applicable special hazards. The “2” for flammability indicates that diesel fuel will ignite with heat and has a flash point between 100° and 200° F. For gasoline, the label will have a “1” in the blue section for health, a “3” in the red section for flammability, a “0” in the yellow section for reactivity, and the white section will be blank since there are no applicable special hazards. The “1” for health indicates that gasoline poses a slight health hazard and may be irritating, while the “3” for flammability indicates that gasoline is readily ignitable and has a flash point below 100° F.

If your Facility does not keep these labels in stock, they can be obtained from Grainger.