



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

MAR 18 1998

Mr. Randolph Martin
E.I. DuPont de Nemours & Co.
1007 Market Street
Room D-3062
Wilmington, DE 19898

Dear Mr. Martin:

This is in response to your letter of January 6, 1998, requesting clarification of the requirements for constructing and certifying a composite 11HG2 Intermediate Bulk Container (IBC) under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Your questions are paraphrased and answered as follows:

Q. Can a composite IBC have a removable or hinged top?

A. Yes.

Q. Can the inner plastic receptacle of a composite IBC be removable?

A. The inner plastic receptacle of a composite IBC may be removed for repair or replacement. However, as provided by § 178.707(b)(1), a composite IBC consists of a rigid outer packaging enclosing a plastic inner receptacle together with any service or other structural equipment. The inner receptacle and outer packaging form an integral packaging and are filled, stored, transported and emptied as a unit.

Q. Can we put a liner inside the inner plastic receptacle?

A. Yes.

Q. Can this liner be removable for unloading?

A. Yes.

Q. Section 178.802 requires conditioning of composite IBCs with fiberboard outer packagings prior to testing; § 178.810 requires freezing to 0°F prior to the drop test. The International Maritime Dangerous Goods (IMDG) Code excepts conditioning when freezing is done. May we follow IMDG guidelines?

A. Packagings certified as manufactured in the United States (i.e., marked USA) must meet 49 CFR part 178 requirements (see § 178.703(a)(1)(v)). However, as provided by § 171.12(b)(5), IBCs manufactured under the IMDG Code are acceptable under the HMR.

Q. Do the construction details matter as long as the final IBC passes the required performance tests?

A. An IBC marked as being manufactured in the United States must meet the standards for composite intermediate bulk containers in § 178.707.

I hope this information is helpful.

Sincerely,



Delmer F. Billings
Chief, Regulations Development
Office of Hazardous Materials Standards



DuPont Sourcing

DuPont Sourcing
Wilmington, DE 19898

cc: W.A. McCurdy - Legal
P.S. Garrison - SPEC

La Valle
178-707
File 178-800
SC: 362

January 6, 1998

Associate Administrator for Hazardous Materials Safety
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590-0001

Attention: Mr. Edward Mazzullo, Director
Office of Hazardous Materials Standards (DHM-10)

COMPOSITE FIBERBOARD INTERMEDIATE BULK CONTAINERS (IBC'S)

Dear Mr. Mazzullo:

As a follow-up to my conversations with Phil Olson of your office on November 17 and December 18, 1997, this letter will confirm my understanding of the hazardous materials regulations as they apply to the construction, certification and use of composite intermediate bulk containers (IBC's), with a fiberboard outer receptacle, UN specification 11HG2.

We are considering the use of composite IBC's for the transport of Sodium Cyanide, a Division 6.1 Solid, Packing Group I. This material is shipped both domestically and via ocean transport for export. The DOT regulations, in 49CFR 173.242, allow the use of both Composite and Fiberboard IBC's, while the IMDG Code, in Section 26, allows Composite but not Fiberboard.

I had posed several questions to Phil to assist us in designing and certifying a package acceptable for use in both markets. Here's a summation of my questions and Phil's responses.

- Can a Composite IBC have a removable top - YES
- Can a Composite IBC have a hinged top - YES
- Can the inner plastic receptacle be removable - YES *178 707(6)(1)*
- Can we put another liner inside the inner plastic receptacle - YES

- Can this liner be removable for unloading - YES

- 49CFR 178.802 requires conditioning of Composite IBC's with fiberboard outer packagings prior to testing; 178.810 requires freezing to 0 F prior to drop test. How do we do both? The IMDG exempts conditioning when the freezing is done. - WE SHOULD FOLLOW THE IMDG GUIDELINES (CONDITIONING NOT REQUIRED)

- Do the construction details matter as long as the final package passes the required performance tests - NO, AS LONG AS THE PACKAGE PASSES THE REQUIRED TESTS IT CAN BE CERTIFIED AS A UN SPECIFICATION PACKAGE.

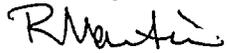
178.707

intended to be consistency w/ IMDG

Please advise if our understanding of these regulations is incorrect.

Call me at (302) 773-4248 if additional information is required. My fax number is (302) 774-8897.

Randolph Martin



Hazardous Materials
Distribution Consultant

E.I. DuPont de Nemours & Co.
1007 Market Street
Room D-3062
Wilmington, DE 19898