



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

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

SEP 11 2003

Mr. Edward F. Vinson  
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Snyder, TX 79550

Ref. No.: 03-0206

This responds to your letter dated August 12, 2003, regarding marking requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) for Intermediate Bulk Containers (IBCs) containing a variety of hazardous materials.

An IBC must be marked with an identification number as specified in §§ 172.302, 172.331 and 172.332. The identification number marking on an IBC must have a width of at least 4.0 mm (0.16 inch) and, with a capacity of less than 3,785 L (1,000 gallons), a height of at least 25 mm (one inch). An identification number marking for an IBC with a capacity of more than 3,785 L (1,000 gallons) must be at least 50 mm (2.0 inches) in height. The options for display of an identification number marking are prescribed in §172.332. Thus, an identification number may be displayed on an orange panel, a placard, or a white square-on-point configuration. For an IBC contained in or on a transport vehicle or freight container, if the identification number marking on the IBC is not visible, the transport vehicle or freight container must be marked as required by §172.332.

In addition, an IBC is subject to the placarding requirements of Subpart F of Part 172. As specified in §172.514(c)(4), an IBC may be placarded on two opposing sides or, alternatively, may be labeled instead of placarded in accordance with Subpart E of Part 172.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

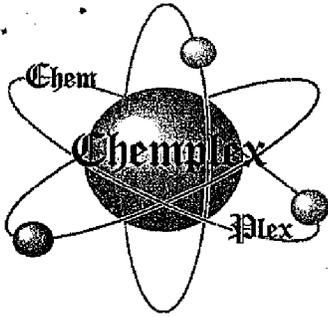
Sincerely,

Susan Gorsky  
Senior Transportation Regulations Specialist  
Office of Hazardous Materials Standards



030206

172,302



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Engram  
\$ 172.302  
Markings  
03-0206

12 August 2003

Office of Hazardous Materials Standards  
Room 8422  
NASSIF Building  
400 7<sup>th</sup> Street SW  
Washington, DC 20590

Dear Sir/Madam:

Our company manufactures and transports a variety of hazardous materials in Intermediate Bulk Containers (IBC's). Two of our drivers have recently been told completely opposite things regarding marking these by law enforcement personnel, so I am writing you for an authoritative opinion on the subject.

49 CFR 172.302 indicates that IBC's should be marked with identification numbers at least one inch in height. 172.331 and 172.332 appear to say that IBC's must carry either placards or orange panels with 3.9 inch numbers. But 172.514 c seems to exempt IBC's from any placard if they are "labeled...in accordance with Subpart E:" that is, with 3.9 inch square-on-point labels.

We are currently using the 3.9 inch labels on each IBC and placarding the transport vehicle, with identification numbers on the placards. Should we also be marking each IBC with identification numbers? If so, do the numbers need to be 3.9 inches tall, despite 172.302? And may we continue to use labels, but use the orange panels for the identification numbers?

We want to, and try hard to, be in compliance with Hazmat regulations, and would very much appreciate some clarification from your office of what we should do to accomplish that. Thank you.

Sincerely

Edward F Vinson