



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

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

APR 7 2006

Mr. Eric Spatt  
Scranton Cooperage, Inc.  
1264 Mid Valley Drive  
Jessup, PA 18434

Reference No.: 06-0054

Dear Mr. Spatt:

This responds to your letter concerning the markings on intermediate bulk containers (IBCs) required by § 180.352 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You ask what is meant by “durably mark the IBC near the manufacturer’s UN design type marking.”

Section 180.352 requires the person performing routine maintenance on an IBC to durably mark the IBC with the country in which the routine maintenance is carried out and the name or authorized symbol of the party performing the routine maintenance. “Durable” generally means “able to exist for a long time without significant deterioration.” It is our opinion that the required markings should remain on the IBC and be clearly legible until the next scheduled retest and inspection.

I trust this satisfies your request.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



060054

180.352

Corbin  
§180.352  
IBC's  
06-0054

# MEMO

FROM THE OFFICE SCRANTON COOPERAGE INC.

1264 Mid Valley Drive  
Jessup PA. 18434  
(570) 383-7244  
(570) 383-7250 FAX  
[ericspatt@scrantoncooperage.com](mailto:ericspatt@scrantoncooperage.com)



Date: 2-21-06  
From : Eric Spatt  
Subject: Regulation interpretation

Regulation Specialist,

We at Scranton Cooperage Inc. M# 5154 are an IBC reconitioner and we need assistance in interpretation of a regulation §180.352 Requirements for retest and inspection of IBCs Sub Section E This a new regulation and we are not sure what is meant by durably mark the IBC near the manufactures information

e) *Requirements applicable to routine maintenance of IBCs.* Except for routine maintenance of metal, rigid plastics and composite IBCs performed by the owner of the IBC, whose State and name or authorized symbol is durably marked on the IBC, the party performing the routine maintenance shall durably mark the IBC near the manufacturer's UN design type marking to show the following:

- (e)(1) The County in which the routine maintenance was carried out; and
- (e)(2) The name or authorized symbol of the party performing the routine maintenance.

Please advice and thank you for your assistance

  
Eric Spatt