

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Request for a letter of interpretation -- IBC Class 9 Domestic Shipment in IBCs
Date: Friday, September 19, 2025 11:31:27
Attachments: [image001.png](#)
Importance: High

Hi Yul,

Please see the below interpretation request.

The phone number is 404-605-8797 and the mailing address is 1557 Marietta Road NW
Atlanta, Georgia.

Let us know if you need anything.

Janaye

From: Johnny Johnson <Johnny.Johnson@whitaker.company>
Sent: Wednesday, September 17, 2025 3:28 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Meka Martin <Meka.Martin@whitaker.company>
Subject: Request for a letter of interpretation -- IBC Class 9 Domestic Shipment in IBCs
Importance: High

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Dear Sir or Madam

A request for clarification. Had a driver ask about placarding of IBC's on a cargo trailer that once held a hazardous substance being ship to a reconditioner. While I was looking thru letters of interpretation I ran across --- REF. NO. 14-0173

The question was asked on 14-0173

Q2: "Is a DOT specification cargo tank motor vehicle required to transport this material, or may a non-DOT specification cargo tank motor vehicles be used?"

A2: "No, a DOT specification cargo tank is not required."

So, my question is since a non-code/Non-DOT specification cargo maybe be used for a bulk Class 9

shipping domestically. May a non-certified or non-performance rated IBC be used in shipping a domestic, ground transportation of a class 9 material?

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Looking forward to your answer – Thanks in advance.

Respectfully

Johnny Johnson

Fleet Compliance and Safety

The Whitaker Company



Atlanta Georgia