



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

JUL 01 2019

Brian Minnich  
Director Tech Service and Quality  
Schuetz Container Systems  
200 North Aspen Hill Road  
North Branch, NJ 08876

Reference No. 18-0112

Dear Mr. Minnich:

This letter is in response to your August 2, 2018, email and subsequent phone conversation with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the requirements for marking an Intermediate Bulk Container (IBC). Specifically, you ask whether the IBC may be marked with a stacking test load at a lesser level than the successful test result or a capacity lower than the rated capacity the IBC was designed to. For example, you present a scenario where a composite IBC successfully completed the test at 3855 kg but is marked 3700 kg, and the rated capacity of the packaging is 2031 L but is marked 2020 L. You ask if this conforms to the marking requirements in § 178.703.

The answer is no. An IBC may not be marked at a lower weight than the stacking test load at which it was successfully tested. In accordance with § 178.703(a)(1)(vii), IBCs must be marked with "the stacking test load in kilograms (kg)." The stacking test load marking is associated with the additional marking requirements for the IBC stack symbol found in § 178.703(b)(7). Specifically, in § 178.703(b)(7)(iv), the maximum permitted stacking load in kilograms must be displayed. The mass marked above the symbol must not exceed the load imposed during the design test, as indicated in § 178.703(a)(1)(vii), divided by 1.8. Further, an IBC must be marked with the rated capacity it was designed to in liters of water at 20 °C (68 °F), as prescribed in § 178.703(b)(1)(i).

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

Dirk Der Kinderen  
Chief, Standards Development Branch  
Standards and Rulemaking Division

Ciccarone  
§ 105.20  
IBC  
18-0112

**Dodd, Alice (OST)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Thursday, August 02, 2018 4:17 PM  
**To:** Hazmat Interps  
**Subject:** FW: Letter of Interpretation  
**Attachments:** IBC UN Marking Letter of Interpretation Request 8-2-2018.docx

Hi Ikea,

Attached is a request for a letter of interpretation. I spoke with Austin regarding his request.

Thank you,  
Jodi

**From:** Austin Ip [mailto:Austin.Ip@schuetz.net]  
**Sent:** Thursday, August 02, 2018 9:35 AM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Letter of Interpretation

Hi,

I am requesting a letter of interpretation in regards to composite IBCs. See attachment.

Thanks.

Austin Ip  
Technical Service Engineer  
Schuetz Container Systems  
200 Aspen Hill Road  
North Branch, NJ 08876-5950  
Phone: 908-526-6161 ext.1126  
Email: [austin.ip@schuetz.net](mailto:austin.ip@schuetz.net)

Schuetz Container Systems Inc.  
200 Aspen Hill Road  
North Branch, NJ 08876

**SCHÜTZ**

August 2, 2018

To: Office of the Chief Counsel  
PHMSA US DOT  
PHC-10  
1200 New Jersey Ave, Southeast building  
Washington, DC 20590 - 0001

From Austin Ip  
Schuetz Container Systems  
200 Aspen Hill Road  
North Branch, NJ 08876

Subject: Request for Letter of Interpretation Regarding UN Marking of Composite IBCs.

In accordance with 49 CFR 105.20, I am requesting a letter of interpretation in regards to the UN marking of composite IBCs. Our company currently produces composite IBCs with designation 31HA1. As such, the UN marking includes stacking weight, gross filling weight (including package), and tare weight. If the corresponding UN test report has the samples tested at a more stringent level, a composite IBC marked at or below the testing level should be considered acceptable. For example, an IBC was tested to the following:

31HA1 / Y / \*\* / USA / +AA6011 / 3855 / 2031 / 57kg / 100kPa

If the package was marked as:

31HA1 / Y / \*\* / USA / +AA6011 / 3700 / 2020 / 58kg / 100kPa

this would be considered acceptable.

Thank you for the assistance.

Sincerely,

Austin Ip  
Technical Service  
Phone: 908-526-6161 ext. 1126  
Email: austin.ip@schuetz.net

HM-224D