



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

July 5, 2023

James Klucsarits
Manager of Quality and Regulatory Affairs
Tanner Industries, Inc.
735 Davisville Road
Southampton, PA 18966

Reference No. 22-0118

Dear Mr. Klucsarits:

This letter is in response to your October 27, 2022, email pertaining to the use of intermediate bulk containers (IBCs) under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). In your email, you note that the § 172.101 Hazardous Materials Table lists special provision “IB3” for the proper shipping name “UN2672, Ammonia solutions, *relative density between 0.880 and 0.957 at 15 degrees C in water, with more than 10 percent but not more than 35 percent ammonia*, 8, PG III.” Special provision IB3 authorizes the following IBCs: Metal (31A, 31B, and 31N); Rigid plastics (31H1 and 31H2); Composite (31HZ1 and 31HA2, 31HB2, 31HN2, 31HD2 and 31HH2). You ask whether a specification 31HA1 composite IBC would be authorized for the transportation of “UN2672, Ammonia solutions, *relative density between 0.880 and 0.957 at 15 degrees C in water, with more than 10 percent but not more than 35 percent ammonia*, 8, PG III.”

The answer is yes. Special provision IB3 lists the letter “Z” as a placeholder rather than listing every possible composite IBC type (HA, HB, HC, etc.). Section 172.102(c)(4) states that the letter “Z” in the marking code for composite IBCs must be replaced with a capital code letter designation found in § 178.702(a)(2) to specify the material used for the other packaging. Therefore, a composite 31HA1 IBC would be authorized under special provision IB3 for your material.

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

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: INFOCNTR (PHMSA)
To: Dodd, Alice (PHMSA); Hazmat Interps
Subject: FW: Question in regards to Ammonia Solution in Totes
Date: Monday, October 31, 2022 4:37:35 PM
Attachments: image001.png

Hi Alice and team,
 Please see the LOI request below. Please note that I spoke to this gentleman over the phone before this email was received and he said he wanted to write in for an LOI, however he did not put it in the header. Let me know if anything else is needed. Thanks.
 -Rachel (HMIC)

From: James Klucsarits <jklucsarits@tannerind.com>
Sent: Thursday, October 27, 2022 4:59 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Question in regards to Ammonia Solution in Totes

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

My question is in regards to the transportation of ammonia solutions in totes or IBCs. Under special provisions 172.102 it lists IB3 (see below):

Hazardous materials descriptions and proper shipping names	Hazard class or Division	Identification Numbers	PG	Label Codes	Special provisions (§172.102)	(8) Packaging (§173.***)			(9) Quantity limitations		(10) Vessel stowage		
						Exceptions	Non-bulk	Bulk	Passenger aircraft/rail	Cargo aircraft only	Location	Other	
	-1	-2	-3	-4	-5	-6	-7	(8A)	(8B)	(8C)	(9A)	(9B)	(10A)
Ammonia solutions, relative density between 0.880 and 0.957 at 15 degrees C in water, with more than 10 percent but not more than 35 percent ammonia	8	UN2672	III	8	IB3, T7, TP1	154	203	241	5 L	60 L	A	40, 85	

IB3 Authorized IBCs: Metal (31A, 31B and 31N); Rigid plastics (31H1 and 31H2); Composite (31HZ1 and 31HA2, 31HB2, 31HN2, 31HD2 and 31HH2).

My question is why 31HA1 is not listed under Composite (is the Z supposed to be an A)? Wouldn't 31HA1 be 31H1 with a steel cage around it?

We have a customer trying to supply 31HA1 totes, but that spec is not listed under the regulation.

Thanks,

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