



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JUN 15 1998

Mr. W. J. Oertly
Senior Inspector
Transportation Technology Center, Inc.
13701 Sutters Mill Circle
Midlothian, VA 23112

Ref. No. 98-0044

Dear Mr. Oertly:

This is in response to your letter of May 4, 1998, regarding identification number markings on portable tanks and intermediate bulk containers under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the identification number must be displayed on a portable tank and intermediate bulk container using an orange panel, the specified placard, or the white square on point configuration or whether § 172.302(b) allows the identification number to be marked directly on the packaging in one inch high letters.

Section 172.332 provides three options for displaying an identification number marking on a bulk packaging. Identification numbers may be displayed on: (1) an orange panel; (2) a specified placard; or (3) a plain white square-on-point display configuration for hazardous materials in hazard classes for which hazard warning placards are not specified.

Section 172.302(a) states that the size requirements for identification number markings are in § 172.332. Section 172.302(b) gives the size requirements for markings other than identification number markings. For example, § 172.326 states that portable tanks must be marked with the appropriate proper shipping name and the owner's name. Those markings must conform to the size requirements provided by § 172.302(b).

I hope this answers your inquiry. If we can be of further assistance, please do not hesitate to contact us.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



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George
172.326
172.331



Bureau of Explosives

May 4, 1998

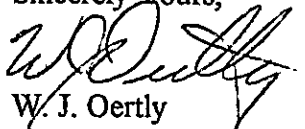
Mr. Del Billings
Research & Special Programs Administration
DHM-II, Room 8102
400 7th St. SW
Washington, DC 20590

Dear Mr. Billings:

In order to clarify an issue for one of our customers I would like an interpretation regarding the marking of identification number on Portable Tanks and Intermediate Bulk Containers of about 300 gallon capacity. At issue is the wording of Sections 172.302(a), 172.302(b), 172.331(a), and 172.332(a) regarding the display of identification numbers. Must the identification numbers be displayed on these tanks using an orange panel, alternative placard, or the white square on point configuration or does section 172.302(b) allow the identification number to be displayed in one inch high lettering ?

If you have any questions please contact me at the above number.

Sincerely Yours,


W. J. Oertly

cc: file