

SEP 3 1998

Mr. Gordon Rousseau
HMT Associates, L.L.C.
1850 K Street NW
Suite 200
Washington, DC 20006

Dear Mr. Rousseau:

This is in response to your letter of September 3, 1998, requesting clarification on the marking requirements for intermediate bulk containers (IBCs) under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180) Specifically you ask if an inner receptacle for an IBC may be marked with three different standards (e.g., 31HA1, 31HG1 and 31HH1) to identify it as having been tested and suitable for use with any one of the three outer casings (i.e., metal, fiberboard or plastic).

The answer is yes. There is no prohibition in the HMR against placing multiple markings on an inner receptacle of an IBC to show that it has been tested to different standards.

I hope this information is helpful.

Sincerely,

for /s/ ETM
Edward T. Mazzullo
Director, Office of Hazardous
Materials Standards

LaValle:DHM-11:68553:9/3/98
File: 178.703

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