



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

FEB 19 2002

Mr. Jake Mailey
Container Specialties Group
P.O. Box 5032
Evanston, IL 60204-5032

Ref. No. 01-0321

Dear Mr. Mailey,

This is in response to your letter dated December 13, 2001, requesting clarification on the retest requirements for an Intermediate Bulk Container (IBC). Specifically you ask if the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) require an IBC to be cleaned prior to retesting.

The answer is no. The HMR do not require an IBC to be cleaned prior to a retest. However, it may be unsafe to test an IBC with certain hazardous materials remaining in the packaging, therefore, it is recommended that an IBC be cleaned prior to retesting.

I hope this satisfies your request

Sincerely,

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



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CSG
CONTAINER SPECIALTIES GROUP

BAH
\$ 178,803
Testing
IBC
01-0321

Thursday, December 13, 2001

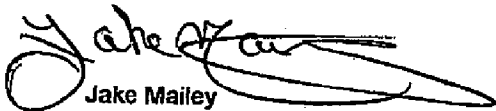
EDWARD MAZZULLO
U.S. DEPT. OF TRANSPORTATION

DEAR MR. MAZZULLO:

I HAVE A QUESTION REGARDING THE PROCEDURE FOR RECERTIFYING INTERMEDIATE BULK CONTAINERS. MUST THE CONTAINER BE WASHED OUT PRIOR TO TESTING OR IS IT ACCEPTABLE THAT IT JUST BE EMPTY TO TEST.

I ASKED THIS QUESTION OF MR. CAMERON SATTERTHWAITE AND WAS TOLD THAT THERE WAS NOTHING IN THE REGULATIONS THAT REQUIRED THE CONTAINER TO BE CLEAN PRIOR TO TESTING. MAY I PLEASE HAVE SOMETHING IN WRITING THAT STATES THIS FOR MY FILES.

Sincerely,


Jake Mailey