



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

OCT 3 2002

Ms. Vicki H. Weightman
INDSPEC Chemical Corporation
1010 William Pitt Way
Pittsburgh, PA 15238

Reference No.: 02-0195

Dear Ms. Weightman:

This is in response to your letter requesting clarification on the requirements for IBCs under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). I apologize for the delay in answering and hope it has not caused you any inconvenience.

Your questions are paraphrased and answered below:

Q1. Does a successful vibration test indicate a flexible IBC is sift proof?

A1. A flexible IBC must be capable of withstanding the vibration test without rupture or leakage. If there is no rupture and or release of material, the IBC is considered sift proof.

Q2. What is the definition of water resistant?

A2. The HMR, at § 171.8, define "water resistant" as "having a degree of resistance to permeability by and damage caused by water in liquid form."

Q3. Is a coated flexible IBC considered water resistant?

A3. The purpose of the coating is to make the IBC "water resistant" or "waterproof." The coating must resist the penetration of water in order to meet the HMR standard.

Q4. Is a 13H2 flexible IBC considered sift proof and water resistant under the current HMR?

A4. The marking "13H2" on a flexible IBC indicates that the IBC is made of woven plastic and coated. It is the opinion of this office that the IBC meets the requirements for "sift-proof" and "water-resistant" in § 178.704 if the IBC resists the penetration of water and is capable of passing the vibration test without rupture or leakage.



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I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards

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INDSPEC HARMARVILLE

NO. 8270 P. 2

INDSPEC
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July 22, 2002

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
Research and Special Programs Administration
U.S. Department of Transportation
400 7th Street SW
Washington, D.C. 20590-0001

Fax: 202-366-3012

Dear Mr. Mazzullo,

I am writing to you to request a written regulatory interpretation regarding special provisions for Flexible IBCs identified under 49CFR172.102, IP Codes. Specifically IP3 states that Flexible IBCs must be sift proof and water resistant or must be fitted with a sift proof and water resistant liner.

Currently, Flexible IBCs require a vibration test. Does the vibration test indicate that the Flexible IBC is sift proof?

What is the definition for water resistant? Is a coated Flexible IBC water resistant:

Under the current DOT regulations, does the 13H2 Flexible IBC meet the requirement for sift proof and water resistant?

I appreciate your time in this interpretation. I can be reached at 412-826-3669 if there are any questions.

Sincerely,

INDSPEC Chemical Corporation

Vicki H. Weightman
Vicki H. Weightman

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§ 172.102 IP3
§ 178.710
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