



U.S. Department  
of Transportation

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

**Pipeline and Hazardous  
Materials Safety Administration**

JUL 9 2007

Mr. Bruce Biehl  
Director of Regulatory Affairs  
Brenntag Southeast, Inc.  
2000 E. Pettigrew Street  
Durham, NC 27703

Ref. No. 07-0098

Dear Mr. Biehl:

This responds to your letter requesting clarification of the IBC marking requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the portable tank marking requirements in § 172.326 also apply to an IBC. In addition, you ask for confirmation that if the identification number markings required by § 172.302(a) on an IBC are not visible, the transport vehicle or freight container must be marked as required by § 172.332 on each side and each end with the identification number specified in the § 172.101 Table.

The marking requirements specified in § 172.326 apply only to portable tanks. In addition, your understanding of the identification number marking requirements for an IBC in §§ 172.331 and 172.332 is also correct.

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



070098

172.326  
172.331

May 7, 2007

Stevens  
§ 172.331  
§ 172.326  
Markings of IBC  
01-0098

Mr. Edward T. Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
1200 New Jersey Avenue, SE East Building, 2nd Floor  
Washington, DC 20590

Dear Mr. Mazzullo:

This letter is to request verification of an email and subsequent phone conversation with Danny of your office regarding the marking requirements of Intermediate Bulk Containers, IBC.

173.302(b) gives requirements for other markings on certain containers.

I want to confirm that IBC containers are to be marked in Accordance with 172.331, Bulk packaging other than portable tanks, cargo tanks, tank cars and multi-unit tank car tanks, as specifically referenced in 172.331(c), For a bulk packaging contained in or on a transport vehicle or freight container, if the identification number marking on the bulk packaging (e.g., an IBC) required by § 172.302(a) is not visible, the transport vehicle or freight container must be marked as required by § 172.332 on each side and each end with the identification number specified for the material in the § 172.101 Table.

In addition that section 173.326 applies to Portable Tanks not IBC.

Thank you in advance for your response.

Sincerely,



Bruce Biehl  
Director of Regulatory Affairs