



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590

JUL 24 2008

Mr. Matt Beasley
GEO Specialty Chemicals
701 Wissahickon Avenue
Cedartown, GA 30125

Ref. No. 08-0175

Dear Mr. Kehrli:

This responds to your July 2, 2008 letter requesting clarification of the placarding and labeling requirements for intermediate bulk containers (IBCs) under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the exception from placarding provided in § 172.514(c) would allow the use of labels, rather than placards, on 175 gallon IBCs containing corrosive materials.

In accordance with § 172.514, except as provided in paragraph (c), each person who offers for transportation a bulk packaging that contains a hazardous material must affix the placards specified for the material in §§ 172.504 and 172.505. The bulk packaging placarding exception for IBCs provided in § 172.514(c)(4) excepts an IBC from placarding if it is labeled in accordance with Part 172, Subpart E of the HMR. Therefore, the HMR allow the use of CORROSIVE labels on 175 gallon IBCs containing corrosive materials.

You should also note that an IBC must be marked with an identification number as specified in §§ 172.332 and 172.336. The authorized sizes and options for display of acceptable identification number markings are prescribed in § 172.332. The options include an orange panel, a placard, or a white square-on-point configuration. For an IBC contained in or on a transport vehicle or freight container, if the identification number marking on the IBC is not visible, the transport vehicle or freight container must be marked as required by § 172.332.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

Susan Gorsky
Acting Chief, Standards Development
Office of Hazardous Materials Standards

Drakeford, Carolyn <PHMSA>

From: INFOCNTR <PHMSA>
Sent: Wednesday, July 02, 2008 2:55 PM
To: Drakeford, Carolyn <PHMSA>
Subject: FW: Information Center Comments/Questions

Supko
§ 172.514
Placarding
08-0175

Request for a written letter of interp.

-----Original Message-----

From: matt.beasley@geosc.com [mailto:matt.beasley@geosc.com]
Sent: Wednesday, July 02, 2008 3:04 PM
To: INFOCNTR <PHMSA>
Subject: Information Center Comments/Questions

Below is the result of your feedback form. It was submitted by Matt Beasley (matt.beasley@geosc.com) on Wednesday, July 2, 2008 at 15:03:39.

Email: matt.beasley@geosc.com

Name: Matt Beasley

Category: Emergency Response Information (Sections 172.1 - 172.807)

Organization: GEO Specialty Chemicals

Street: 701 Wissahickon Ave

City: Cedartown

State: Georgia

Zip Code: 30125

Phone: 770 748 1200 283

Comments: Because of conflicting opinions from "experts" in the field, we would like to get confirmation in writing re: the interpretation of 172.514(c) that we can place the 4" x 4" diamond "CORROSIVE" labels on 175 gallon totes (IBCs) instead of the placards. We understand we will still need the 1" tall letters with the Proper Shipping Name near each label.

Thank you