



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

APR 24 2012

Mr. Kevin M. Greene
DuPont Global Logistics
P.O. Box 525
Axis, Alabama 36505

Reference No. 12-0054

Dear Mr. Greene:

This responds to your February 13, 2012 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to Intermediate Bulk Containers (IBCs). Specifically, you seek clarification regarding marking, labeling, and placarding requirements for IBCs as recently adopted in a final rule under Docket Number PHMSA-2009-0151 (HM-218F), entitled "Hazardous Materials; Miscellaneous Amendments," and published in the Federal Register on July 20, 2011 [76 FR 43510].

In your letter, you state that under the revised requirements adopted in the HM-218F final rule, it is your understanding that when an IBC is labeled instead of placarded in accordance with § 172.514(c)(4), identification markings may be displayed in accordance with the marking requirements in § 172.301(a)(1) and, therefore, have no specific size requirements.

Your understanding is correct. As specified in § 172.336(d), when a bulk packaging is labeled instead of placarded in accordance with § 172.514(c), identification number markings may be displayed on the package in accordance with the marking requirements of § 172.301(a)(1). If identification number markings are displayed on the package in accordance with the marking requirements of § 172.301(a)(1), there are no specific size requirements for the identification number markings and § 172.302(b)(2) is not applicable.

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

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Benedict
§172.301
§172.336
Marking
12-0054

DuPont Global Logistics
P.O. Box 525
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DuPont Global Logistics

13 February 2012

Mr. T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

Request a written formal interpretation regarding marking the UN/ID number on an Intermediate Bulk Container (IBC) post HM-218F (172.336(d)).

Dear Mr. Foster:

Specifically, I request clarification of 172.336(d) as created under Docket HM-218F (PHMSA-2009-0151; 20 July 2011). It is my understanding that when an IBC is labeled instead of placarded in accordance with §172.514(c) of the Hazardous Material Regulations, identification number markings may be displayed on the package in accordance with the marking requirements of §172.301(a)(1). With that being said, there is no requirement in §172.301(a)(1) with respect to the letter size of the UN number marked on the IBC. Further more, it's my understanding the width and height requirements specified in 172.302 (b)(2) are not applicable when marking the UN number on an IBC. Is my understanding correct?

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

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