



U.S. Department
of Transportation

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

**Pipeline and
Hazardous Materials Safety
Administration**
FEB - 3 2006

Mr. Mark A Connolly

Ref. No. 05-0299

Manager Transportation Regulations
and Security

Akzo Nobel Chemicals
300 South Riverside Plaza
Chicago, IL 60606-6697

Dear Mr. Connolly:

This is in response to your October 7, 2005 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you seek clarification regarding the specification plate markings for initial test and inspection of UN31A metal intermediate bulk containers (IBCs).

According to your letter, your company recently purchased new UN31A IBCs for the transportation of organic peroxides. These IBCs contain all of the information required by § 178.703(a) on a specification plate. Except for the month and year of the last leakproofness test and the month and year of last inspection, the IBCs are marked with the additional information required by § 178.703(b)(2).

In accordance with § 178.813, a leakproofness test must be conducted for the qualification of all IBC design types and on all production units intended to contain liquids or solids loaded or discharged under pressure. Each IBC must also have an external visual inspection initially after production and every 2.5 years starting from the date of manufacture. The month and year of the leakproofness test and last inspection must be marked on each IBC as required by § 178.703(b) before an IBC may be filled and offered for transportation.

The person who certifies an IBC must keep records of design qualification tests in accordance with § 178.801(i).

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

Sincerely,

John A. Gale

Chief, Standards Development
Office of Hazardous Materials Standards



050299

178.703
178.801
180.350

Gale, John <PHMSA>

LEARY
\$178,703
\$178,801
\$180,350

all
John

From: Connolly, M (Mark) [Mark.Connolly@sc.akzonobel.com]

Sent: Friday, October 07, 2005 11:41 AM

To: Gale, John <PHMSA>

Subject: UN31A IBC - Specification plate marking and initial test and inspection

Importance: High

IBC
05-0299

Hi John,
I understand that you're working from home today -
Hope you are able to get out to the links this weekend - I'm going up to Lake Geneva Wisconsin Saturday to get
in 36 holes - before the weather gets too cold...

I need some clarification from you regarding the specification plate markings and initial test and inspection for
metal UN31A IBC's.
We have received some newly built IBC's made in China (built 09/05) for loading of organic peroxides. Akzo
Nobel is the owner of the new UN31A IBC's.

I'm specifically looking at 49CFR 178.703 (a) (1) (b) (2) ; 178.801 (f), 178.801(i); and 180.350.

Each IBC metal specification plate is marked with the following:

- The UN symbol: "UN inside a circle"
- The code designating the type of IBC: "31A"
- The capital letter designating the package group: "Y"
- The month and year (last two digits) of manufacture: "08 05"
- The country authorizing the Mark Connolly The name and or symbol of the manufacturer: "CHINA/SPMMC"
- The stacking test load in kilograms. Since these are not designed for stacking the figure: "0"
- The maximum permissible gross mass in kilograms: "2300"
- [IMO 6.5.2.1 and 49CFR 178.703 (a)(1)]

Additional markings that appear on the above noted specification plate:

- Capacity in liters at 20C: "CAPACITY 1500 L"
- Tare mass in kilograms: "TARE 512 KG"
- Maximum filling or discharge pressure in kPa or bar if applicable: "TEST PRESSURE 80KPA"
- Body material and its minimum thickness in mm: "SHELL MAT. 304 S.S. THKNS. 35 MM"
- Date of last leakproof test, (month and year):
- Date of last inspection (month and year):
- Serial number of manufacturer: "SERIAL NO. 05-C-17-25"
- [IMO 6.5.2.2.1 and 49CFR 178.703 (b)(2)]

The Chinese manufacture has provided us with documentation of pressure tests and Pneumatic tests conducted
at their facility during production. Their documents are not a one to one ratio for each IBC serial number. They
have provided us with a summary of test and inspection documents that groups the IBC's into lots of 10.

With the above noted specification plate marking (no date of last inspection and no date of last leakproof test) and
the summary document -

Is the above noted information is sufficient for us to load these IBC's?

Or do you recommend that we conduct our own inspection prior to filling and conduct a leakproof test
along with an External visual and document it according to 178.801(i)?

Please call me at 312 544 7177

Mark A. Connolly
Manager Transportation Regulations and Security

10/27/2005