



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety Administration**

FEB 8 2007

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

Sgt. David P. Feather  
Commonwealth of Virginia  
Department of State Police  
9801 Braddock Road  
Fairfax, VA 22032

Ref. No.: 07-0003

Dear Sergeant Feather:

This is in response to your December 29, 2006 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) concerning the transportation of gasoline in intermediate bulk containers (IBCs). Specifically, you ask whether there is an oversight in Column 7 of the § 172.101 Hazardous Materials Table regarding the use of Special IBC Packing Provision IB2 for a material classed as "Gasoline, 3, UN1203."

The answer is no. Special IBC Packing Provision IB2 is only authorized for liquids with a vapor pressure less than or equal to 110 kPa at 50 °C (1.1 bar at 122 F), or 130 kPa at 55 °C (1.3 bar at 131 °F). The vapor pressure of gasoline exceeds these amounts; therefore, Special IBC Packing Provision IB2 is not authorized for a material classed as "Gasoline, 3, UN1203."

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Charles E. Betts  
Senior Transportation Specialist  
Office of Hazardous Materials Standards



070003

172-101



COMMONWEALTH OF VIRGINIA

DEPARTMENT OF STATE POLICE

300 Spotswood Road, Fairfax, VA 22031

703-923-2001

December 29, 2006

BAAH  
§ 172.101  
§ 173.242  
Bulk Packagings  
07-0003

Commonwealth of Virginia  
Department of State Police  
300 Spotswood Road  
Fairfax, VA 22031  
703-923-2001

11 Courthouse Square, Richmond  
County Superintendant

Mr. Edward T. Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. DOT/PHMSA (PHH-10)  
400 7th Street S.W.  
Washington, D.C. 20590-0001

Dear Mr. Mazzullo:

I respectfully request a clarification concerning the transportation of Gasoline in Intermediate Bulk Containers.

In the current edition of 49 CFR, the table entry for Gasoline, there are no special provisions that allow for the use of an IBC. The bulk package section in column 8C of the § 172.101 table directs you to § 173.242. As stated in 173.242(d), an IBC is authorized, subject to conditions and limitations in this section, provided the IBC type is authorized according to the IBC packing code specified for the specific material in column 7 of the § 172.101 Table. In referring to column 7, the only Special Provisions are 144, B1, B33, and T8, none of which would authorize an Intermediate Bulk Container.

In earlier editions of 49 CFR authorized the use of IBC's to transport gasoline through special provision IB2. In the 2003 edition of 49 CFR until now, this special provision has been removed and special provision B1 inserted. In looking through the table there are numerous other Class 3 materials in Packing Group II that are authorized to be transported in IBC's.

I question if this is an oversight in the table.

Any help in this matter would be greatly appreciated.

Sincerely,

David P. Feather, Sergeant