



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

JUN 05 2014

Mr. William Scott Burson
Crash Investigator
Commercial Motor Vehicle Roadside Inspection
Denton Police Department
601 E Hickory St., Suite E
Denton, TX 76205

Reference No. 13-0206

Dear Mr. Burson:

This is in response to your October 31, 2013 e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to identification numbers on Intermediate Bulk Containers (IBCs). In your scenario, a 500 gallon IBC containing a Class 8 corrosive liquid is transported on an open-sided flatbed truck. The IBC has the correct United Nations (UN) identification number on orange panels on two opposing sides in accordance with § 172.302(a)(2). These identification numbers are viewable from either side of the flatbed. You ask if the flatbed is also required to display the UN identification numbers on the front and rear of the vehicle.

The answer is no. As prescribed in § 172.302(a), bulk packages with a capacity of less than 1,000 gallons capacity are required to display identification numbers only on two opposing sides. For bulk packages of 1,000 gallons capacity or more, identification numbers must be displayed on all four sides.

I hope this satisfies your request.

Sincerely,

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

Andrews
§ 172.331(c)
Marking
13-0206

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Thursday, October 31, 2013 4:48 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Interpretation request: 172.331(c)

Hi Carolyn,

This caller requested we submit this e-mail as a formal letter of interpretation.

Thanks,
Victoria

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

From: Burson, William S [mailto:]
Sent: Wednesday, October 30, 2013 5:10 PM
To: PHMSA HM InfoCenter
Subject: Interpretation request: 172.331(c)

PHMSA,

I'm requesting an interpretation (or written guidance) concerning required vehicle markings when transporting a bulk package per 172.331(c).

The scenario is thus: A single 500-gallon IBC of corrosive liquid is transported on an open-sided flatbed. The IBC has the correct UN identification number on orange panels on two opposing sides per 172.302(a)(2). The UN identification number on the IBC is visible to an observer standing to either side of the flatbed. Is the flatbed carrying the IBC also required to display the UN identification number on the front and rear of the vehicle?

Again, [worded slightly differently] when considering a open-sided flatbed carrying a properly marked 500-gallon IBC, and the UN identification numbers on the IBC are visible to an observer on either side of the flatbed, does the flatbed also require UN identification numbers on the front and rear of the vehicle?

Thank you.

Wm Scott Burson
Crash Investigator/Commercial Motor Vehicle Roadside Inspector Denton Police Department
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Thank you for your cooperation.