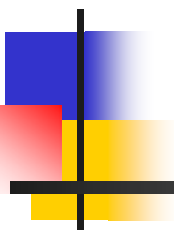


Composite IBC Inspection Requirements



Intermediate bulk container or IBC means a rigid or flexible portable packaging, other than a cylinder or portable tank, which is designed for mechanical handling. Standards for IBCs manufactured in the United States are set forth in subparts N and O of part 178 of this subchapter



§ 180.352 Requirements for retest and inspection of IBCs

(a) General

- *Each IBC constructed in accordance with a UN standard for which a test or inspection specified in paragraphs (b)(1), (b)(2) and (b)(3) of this section is required may not be filled and offered for transportation or transported until the test or inspection has been successfully completed. This paragraph does not apply to any IBC filled prior to the test or inspection due date.*



b) Each IBC is subject to the following test and inspections

- (1) Each IBC intended to contain liquids must be tested in accordance with the leakproofness test prior to its first use in transportation and every 2.5 years thereafter, starting from the date of manufacture.

- (2) An external visual inspection must be conducted initially after production and every 2.5 years starting from the date of manufacture to ensure that:
 - **(i) The IBC is marked in accordance with requirements in §178.703**

 - **(ii) Service equipment is fully functional**

 - **(iii) The IBC is capable of withstanding the applicable design qualification tests. The IBC must be externally inspected for cracks, warpage, corrosion or any other damage**

- (3) Each composite IBC must be internally inspected at least every five years.



§ 178.703 Marking of IBCs.

iv) Date of last leakproofness test, if applicable (month and year); and

(v) Date of last inspection (month and year).



(g) *Record retention*

- (1) The owner or lessee of the IBC must keep records of periodic retests, initial and periodic inspections, and tests performed on the IBC if it has been repaired or remanufactured.
- (2) Records must include design types and packaging specifications, test and inspection dates, name and address of test and inspection facilities, names or name of any persons conducting test or inspections, and test or inspection specifics and results.
- (3) Records must be kept for each packaging at each location where periodic tests are conducted, until such tests are successfully performed again or for at least 2.5 years from the date of the last test. These records must be made available for inspection by a representative of the Department on request.



§ 178.813 Leakproofness test.

- (a) *General.* The leakproofness test must be conducted for the qualification of all IBC design types and on all production units intended to contain solids that are loaded or discharged under pressure or intended to contain liquids.
- (c) *Test method and pressure applied.* The leakproofness test must be carried out for a suitable length of time using air at a gauge pressure of not less than 20 kPa (2.9 psig). Leakproofness of IBC design types must be determined by coating the seams and joints with a heavy oil, a soap solution and water, or other methods suitable for the purpose of detecting leaks.
- (d) *Criterion for passing the test.* For all IBC design types intended to contain solids that are loaded or discharged under pressure or intended to contain liquids, there may be no leakage of air from the IBC.

DOT 57 Tank Inspection Requirements

§ 180.605 Requirements for periodic testing, inspection and repair of portable tanks.

- (a) A portable tank constructed in accordance with a DOT specification for which a test or inspection specified in this subpart has become due, must be tested or inspected prior to being returned for transportation.
- (c) *Schedule for periodic inspections and tests.*
- (3) Each Specification 56 or 57 portable tank must be given a periodic inspection and test at least once every 2.5 years.
- (e) *Periodic inspection and test.* The periodic inspection and test must include an internal and external examination and a pressure test as specified in this section.
- (k) *Inspection and test markings.*
- (2) Each Specification DOT 51, 56, 57 or 60 portable tank must be durably and legibly marked, in English, with the date (month and year) of the most recent periodic retest.
- (l) *Record retention.* The owner of each portable tank or his authorized agent shall retain a written record of the date and results of all required inspections and tests, and the name and address of the person performing the inspection or test.



DOT Enforcement

OLD BRIDGE CHEMICALS, INC. (Shipper)

Offered corrosive liquid, basic, inorganic, n.o.s., in an intermediate bulk container that was not authorized because it had not been inspected and retested within the past 2.5 years; offered the same material in 55-gallon plastic drums that were not authorized because (1) one drum was not marked as meeting the appropriate UN performance standard and (2) another drum marked as meeting a UN standard was not leakproofness tested; failed to create and retain records of employee training testing.

- [173.35(a), 173.241(d), 180.352(a) and (b), 173.28(b)(2), 178.604, 172.704(d)]
 - Case No. 00-071-SIBC-EA
\$7,900



DOT Enforcement

CHEMICAL TECHNOLOGIES INCORPORATED (Shipper)

Offered hazardous material in an unauthorized intermediate bulk container that was not authorized because it had not been inspected and retested in last 2.5 years.

[180.352(a) and (b)]

Case No. 00-267-SPT-SO

\$4,200



DOT Enforcement

- **HARCROS CHEMICALS, INC.**
(Shipper)
- Offered combustible liquid, n.o.s. (containing ethylene glycol butyl ether), in a portable tank marked as meeting the DOT 57 specification, when it had not been retested within the prior 2.5 years.
 - [173.32(e)(1)(ii), 173.32(e)(5)]
 - Case No. 00-238-SPT-SW
\$6,140



§ 165.45 Refillable Container Standards.

- (a) *What Department of Transportation (DOT) standards do my refillable containers have to meet under this part if my pesticide product is not a DOT hazardous material ?*
- (1) A pesticide product that does not meet the definition of a hazardous material in 49 CFR 171.8 must be packaged in a refillable container that, if portable, is designed, constructed, and marked to comply with the requirements of 49 CFR 173.4, 173.5, 173.6, 173.24, 173.24a, 173.24b, 173.28, 173.155, 173.203, 173.213, 173.240(c), 173.240(d), 173.241(c), 173.241(d), part 178, and part 180 that are applicable to a Packing Group III material, or, if subject to a special permit, according to the applicable requirements of 49 CFR part 107 subpart B. The requirements in this paragraph apply to the pesticide product as it is packaged for transportation in commerce.
 - (2) A refiller is not required to comply with 49 CFR 173.28(b)(2) for pesticide products that are not DOT hazardous materials if the refillable container to be reused complies with the refillable container regulations in this subpart and the refilling is done in compliance with the repackaging regulations in subpart D of this part.



§ 165.45 Refillable Container Standards.

(b) *What DOT standards do my refillable containers have to meet under this part if my pesticide product is a DOT hazardous material?*

- (1) If your pesticide product meets the definition of a hazardous material in 49 CFR 171.8, the DOT requires your pesticide product to be packaged according to 49 CFR parts 171-180 or, if subject to a special permit, according to the applicable requirements of 49 CFR part 107 subpart B.
- (2) For the purposes of these regulations, a pesticide product that meets the definition of a hazardous material in 49 CFR 171.8 must be packaged in a refillable container that, if portable, is designed, constructed, and marked to comply with the requirements of 49 CFR parts 171-180 or, if subject to a special permit, according to the applicable requirements of 49 CFR part 107 subpart B. The requirements in this paragraph apply to the pesticide product as it is packaged for transportation in commerce.



Thank You

Schoettmer **E**nterprises **I**nc.

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