



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

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

JAN 25 2007

Mr. Craig Heinze  
Bonar Plastics, Inc.  
1005 Atlantic Drive  
West Chicago, IL 60185

Ref. No.: 06-0268

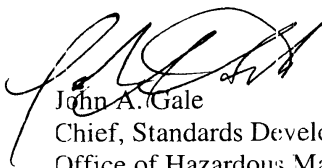
Dear Mr. Heinze:

This is in response to your November 17, 2006 letter regarding testing requirements for IBC's under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You describe the IBC as a plastic bottle with two different sized openings in the bottle top, nine inches and two inches. You provided pictures of the IBC with an arrangement of eight different possible fittings. You ask if the IBC may utilize a single certification number, provided it is successfully tested with each of the eight different fittings.

Section 178.801(d) requires design qualification testing at the start of production of each new or different IBC design type. Section 178.801 defines a "different IBC design type" as one that differs from a previously qualified IBC design type in structural design, size, material of construction or wall thickness, but does not include a packaging that differs in service equipment. Section 178.700(c)(2) defines service equipment to mean filling and discharge, pressure relief, safety, heating and heat-insulating devices and measuring instruments. An IBC may be certified as a single design type provided: (1) the fittings meet the definition of service equipment; and (2) the IBC successfully passes the design qualification testing requirements with service equipment representative of each of the fittings described in your letter. Note that, a description of the design type, including the representative service equipment used for testing the IBC, is required to be documented under the recordkeeping requirements in § 178.801(l).

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

Sincerely,



John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



060268

178.700  
178.801 (1)

Eichenlaub  
§178.700  
Definitions  
06-0268

11/17/06

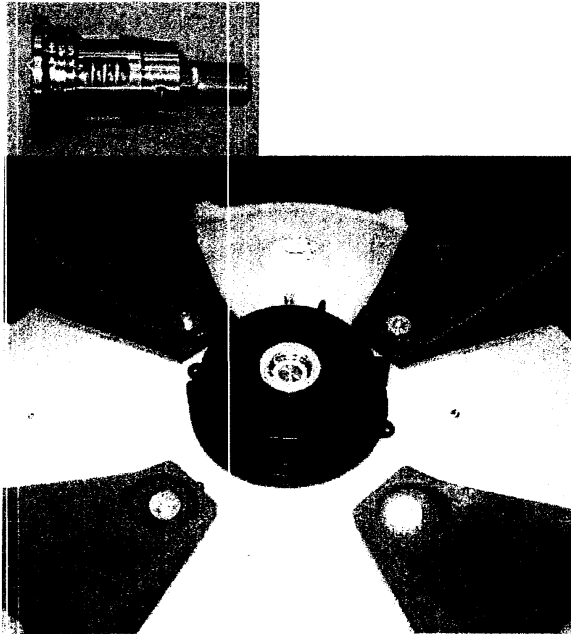
To whom it may concern,

This letter is to request that Bonar Plastics be allowed to consolidate combinations of various service equipment, as defined in CFR 49 178.700c(ii), to collectively be included on one UN/DOT certification number, for a given size IBC.

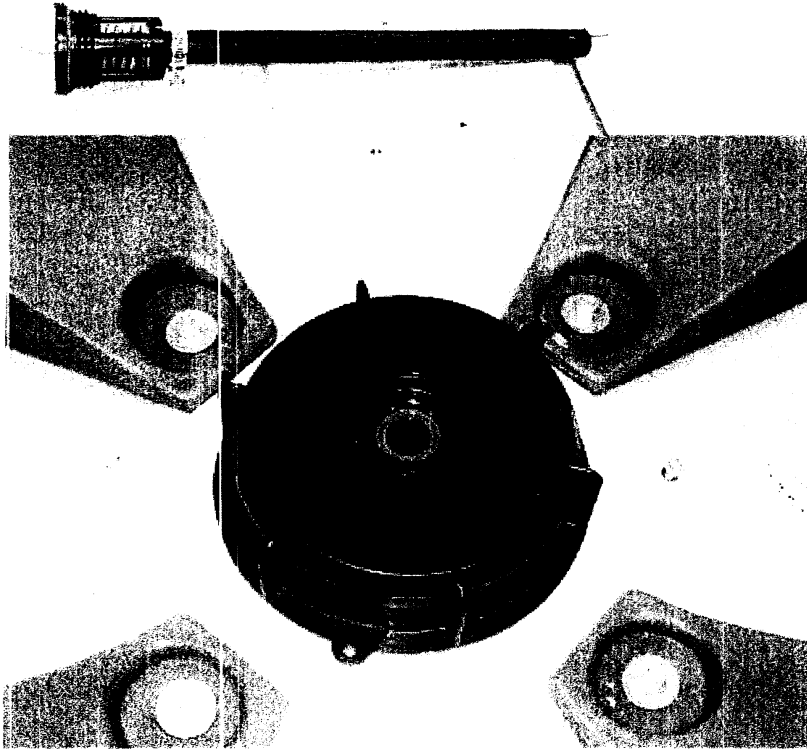
In particular, Bonar Plastics makes several combinations of B120 IBC's. There are two different sized openings in the bottle tops, 9" and 2". The current variety of fittings will be enumerated below. After successful passage of testing fitted IBC's comprising ALL of the following fittings, we would like to utilize a single certification number to cover the applicable permutations. The following fittings will be included in our testing:

**For the 9" opening:**

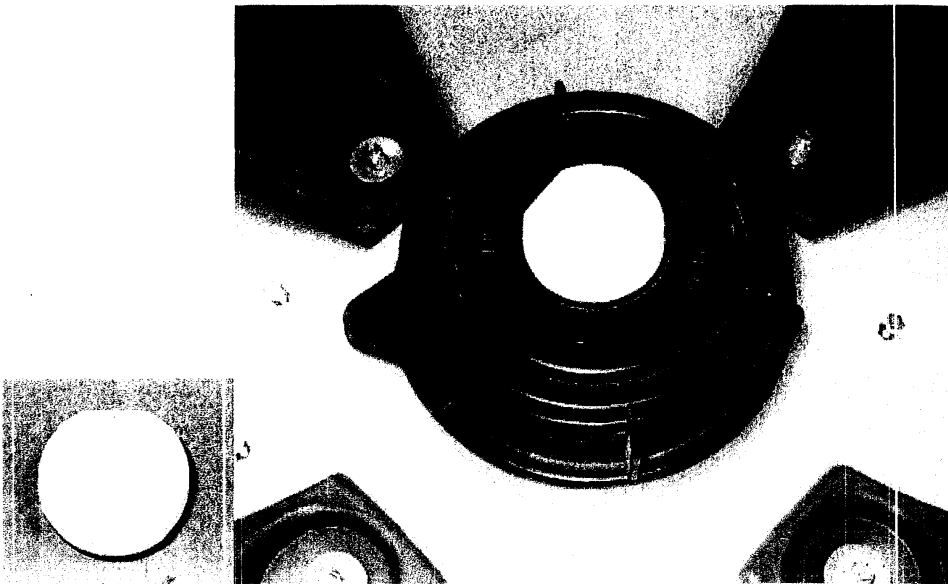
1. IPS Micromatic valve:



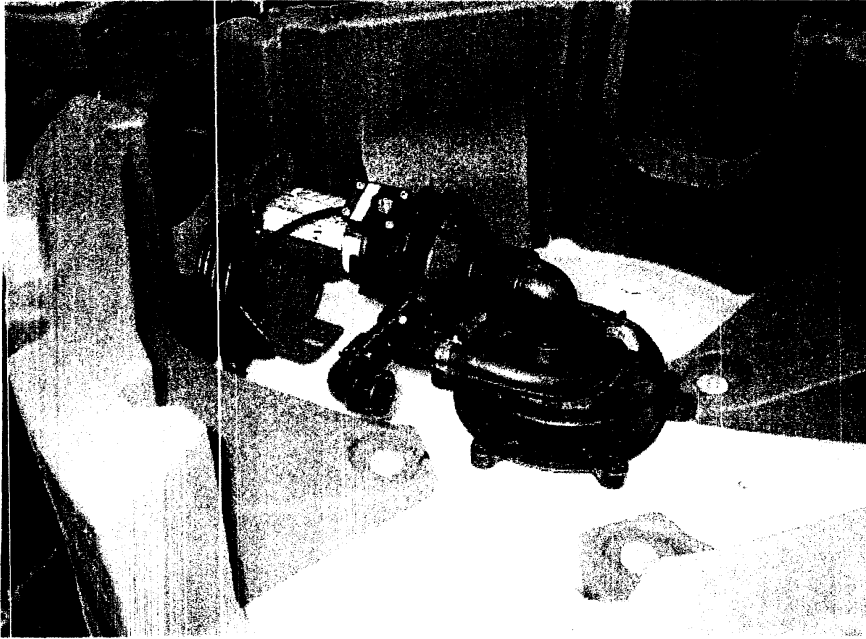
2. TCC Micromatic valve:



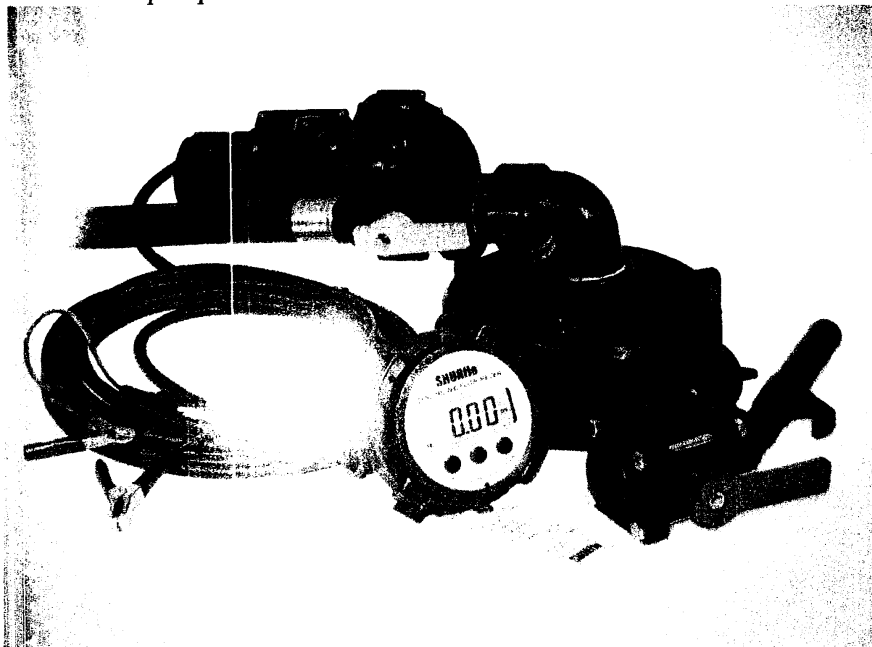
3. Combi-Vent:



4. Flowserve pump:

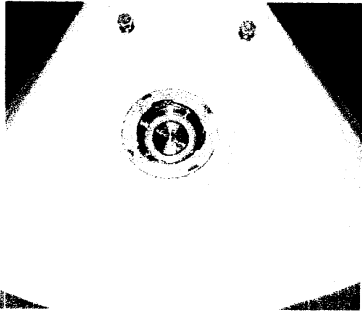


5. SHURflo pump:

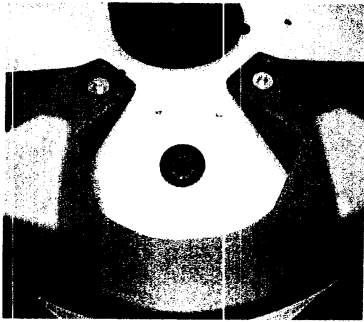


**For the 2" openings:**

1. IPS Micromatic valve:



2. TCC Micromatic valve:



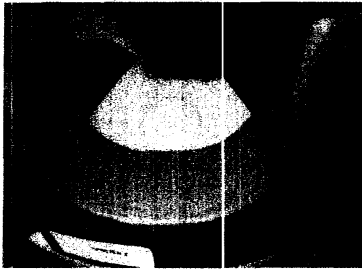
3. BE vent:



4. B-ADBKO fitting:



5. Blank (no hole):



Again, it is our sincere hope that with successful passage of various combinations of all fittings above, we can utilize one UN/DOT certification number for our production needs incorporating these components.

Please contact me at your earliest convenience for clarification or direction on this most important matter.

Thank you.

Craig Heinze  
Quality Engineer  
Bonar Plastics, Inc.  
1005 Atlantic Drive  
West Chicago, IL 60185  
(630) 293-0303