



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

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

OCT 29 2007

Mr. Roger Davies
WESTERN
Environmental Containment Solutions
85 Research Drive
Stamford, CT 06906

Ref. No. 07-0184

Dear Mr. Davies:

This responds to your September 13, 2007 letter requesting information on IM-102 portable tanks under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

In accordance with §173.32(c)(2), DOT Specification 51, IM-101 and IM-102 portable tanks may not be manufactured after January 1, 2003, but may continue in use provided they meet the requirements of the HMR in effect on September 30, 2001 or the new "T" codes in §172.102(c)(7)(i). In addition, the tank must pass periodic inspections and tests specified for the particular portable tank in Subpart G of Part 180. After January 1, 2003, all newly constructed portable tanks must conform to requirements for the design, construction and approval of UN portable tanks as specified in §§178.273, 178.274, 178.275, 178.276, 178.277 and Part 180, Subpart G, of the HMR.

I hope this answers your inquiry.

Sincerely,

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



070184

173.32(c)(2)
178.277
172.102(c)(7)(i)

WESTERN 

Booth
§ 173.32 (C)(2)
§ 178.213
Portable Tanks
07-0184

September 13, 2007

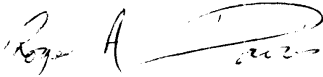
Hazardous Material Regulations
DOT/RSPA
DHM-10/RM 8102
Washington, DC 20590

Dear Sirs:

We are a retailer of large IBC's and in this connection we have heard of specification IM102 – can you advise us what that regulation is, and what it covers?

Thank you in advance for your help.

Sincerely,



Roger Davies

/fm

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