



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

April 24, 2024

William Dworsky  
President  
Consolidated Container Company  
109 27<sup>th</sup> Ave NE  
Minneapolis, MN 55418

Reference No. 23-0098

Dear Mr. Dworsky:

This letter is in response to your November 2, 2023, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the attachment of “label plates” on repaired and/or remanufactured Intermediate Bulk Containers (IBCs). In your email, you provide a picture of a United Nations (UN) 31HA1 composite IBC with a “label plate” screwed into the steel outer packaging surrounding the plastic inner receptacle. It is your understanding that when a new “label plate” is installed on an IBC, it should be done in a manner that does not affect the integrity of the package.

Your understanding is correct. While the HMR do not specifically state that “label plates”—or any other hazard communication—cannot be screwed into the steel outer packaging surrounding the plastic inner receptacle of a composite IBC, § 173.28(a) states that “before reuse, each packaging must be inspected and may not be reused unless free from incompatible residue, rupture, or other *damage which reduces its structural integrity.*”

Based solely on the picture provided in your email, it is not possible to determine whether the screws in the steel outer packaging have affected the integrity of the composite IBC. However, if you have evidence that the screws have affected the integrity of the composite IBC, this would not be an acceptable method for attaching “label plates.” Please note that this letter only addresses the effect that screwing the “label plate” into the outer cage has on the integrity of the composite IBC pictured in your email and does not address the marking requirements associated with this composite IBC.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

Steven Andrews  
Acting Chief, Regulatory Review and Reinvention Branch

## Standards and Rulemaking Division

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Interpretation Request  
**Date:** Friday, November 3, 2023 11:38:37 AM  
**Attachments:** [image001.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Hi Alice,

Please see the below interpretation request.

Let me know if you need anything.

Regards,

-Breanna

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**From:** William Dworsky <wdworsky@containerexperts.com>  
**Sent:** Thursday, November 2, 2023 10:10 AM  
**To:** PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>  
**Subject:** Interpretation Request

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good Morning,

To whom this may concern,

We are seeking an interpretation on the proper reattachment of plaquard plates on Repaired/Remanufactured IBC's.

As you can see in the below picture, this company applied a new label plate using screws into the cage.

We are of the understanding that when installing a new label plate, its done in a manner that doesn't change the integrity of the original package (IE. Zip ties or rebending the plate around the bars).

Looking forward to your intpretation of this question.

Respectfully,

William Dworsky  
President



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UN31HA1/Y/ /USA/ / kg/  
 kg/ L/ kg/ kpa/ /

USA/ M6 188

Check-Up: \_\_\_\_\_ Inspection: 10/22

1,450 kg MAX



During Transport

LOT#81041023D

**PRECAUTIONARY STATEMENTS  
 HAZARDS TO HUMANS AND  
 DOMESTIC ANIMALS**

**DANGER**  
 Causes severe skin burns and eye damage.  
 Causes respiratory irritation.  
 Causes serious eye irritation.  
 Causes skin irritation.  
 Causes allergic skin reaction.  
 Causes respiratory irritation.  
 Causes serious eye irritation.  
 Causes skin irritation.  
 Causes allergic skin reaction.

**KEEP OUT OF REACH OF CHILDREN  
 DANGER**

**FIRST AID**  
 Inhalation: Move to fresh air. If breathing is difficult, give oxygen.  
 Skin Contact: Wash with plenty of water for at least 15 minutes.  
 Eye Contact: Hold eyelids open. Wash with plenty of water for at least 15 minutes.  
 Ingestion: Do not induce vomiting. Rinse mouth with water. Drink water.

**WHEN THE PRODUCT IS RELEASED  
 TO THE ENVIRONMENT, IT MAY CONTAMINATE  
 SURFACE WATER AND GROUNDWATER.**

**ENVIRONMENTAL PRECAUTIONS**  
 Do not empty into drains, waterways, or onto the ground.  
 Do not mix with other chemicals.  
 Do not use in confined spaces.  
 Do not use near open flames or heat sources.  
 Do not use in areas where it may come in contact with food or feed.

**REGULATORY INFORMATION**  
 DPC INDUSTRIES, INC.  
 2500 W. 10th Street  
 Tulsa, OK 74107  
 Phone: 918-438-1111  
 Fax: 918-438-1112  
 Email: sales@trailercleaning.com  
 www.trailercleaning.com

**DIXICHLOR MAX**

ACTIVE INGREDIENTS: 10.0%  
 OTHER INGREDIENTS: 90.0%  
 TOTAL: 100.0%

**DIRECTIONS FOR USE**  
 Use as a disinfectant and sanitizer for all hard surfaces.  
 Dilute with water according to the label directions.  
 Do not use on natural stone, waxed wood, or other sensitive surfaces.  
 Do not use on electrical outlets or switches.  
 Do not use on painted surfaces.



UN1791  
 HYPOCHLORITE SOLUTION

10/22



Call For Empty Container Collection  
 Phone: 785-777-2828  
 Email: sales@trailercleaning.com  
 www.trailercleaning.com  
**TCS-11795**

CHECK VALVE INSTALLED