

IBC Leakproofness Test Records

How marking, documentation, and a unique unit identifier work together

THE QUICK CONCLUSION

The date marked on an IBC is not the complete test record required by 49 CFR 180.352(g). The owner or lessee must keep the specified records for each packaging. A customer or shipper should use a unique unit identifier to connect each IBC to its own report, confirm that the marking and report agree, and verify that the required leakproofness test is current before filling and offering the IBC for transportation.

01 Who must keep the record

For metal, rigid plastic, and composite IBCs intended to contain liquids, 49 CFR 180.352(b)(1) requires a leakproofness test before first use in transportation and every 2.5 years thereafter. Section 180.352(g) places the record-retention duty on the IBC owner or lessee. A customer or shipper may hold that role, but the terms are not automatically interchangeable.

02 A marking and a record are not the same

- For rigid plastic and composite IBCs, the additional marking includes the month and year of the last leakproofness test, if applicable, and the last inspection.
- For metal IBCs, the corrosion-resistant plate includes the same leakproofness-test and inspection dates, plus the manufacturer-assigned serial number.
- The retained report contains the design type and packaging specification, dates, facility information, person conducting the work, and test or inspection specifics and results.
- A date marking alone does not contain all of those required record elements.
- A report that cannot be matched to the individual IBC does not provide clear unit-level evidence for that packaging.
- Use both controls: inspect the physical marking, then match it to the retained report for that IBC.

KEEP BOTH CONTROLS

The marking makes test status visible on the IBC. The retained report supplies the detailed evidence. Neither should be treated as a substitute for the other.

One IBC, one traceable identifier

- 49 CFR 180.352(g)(3) requires records for each packaging, not only for an undifferentiated batch.
- Assign each IBC a durable, readable unit identifier and place the same identifier on its report or controlled record index.
- The phrase 'unique identifier' is an operational control; the regulation itself states that records must be kept for each packaging.
- Metal IBCs require a manufacturer-assigned serial number under 49 CFR 178.703(b)(2)(vii); use it when it remains readable and reliably tied to the record.
- For composite IBCs, establish a one-to-one identifier on the identification plate or controlled faceplate without obscuring required UN, test, or inspection markings.

Minimum retained record content

- IBC design type and packaging specification.
- Test and inspection dates.
- Name and address of the test and inspection facility.
- Name or names of the persons conducting the test or inspection.
- Test or inspection specifics and results, including the leakproofness-test result when applicable.
- A controlled association with each individual packaging and the record set maintained at the periodic-test location.

Customer and shipper control

- Determine and document who is the owner or lessee responsible for the 49 CFR 180.352(g) records.
- Before filling and offering the IBC, verify that no prescribed retest or inspection is past due, as required by 49 CFR 173.35(a).
- Read the leakproofness-test and inspection dates on the IBC and compare them with the latest retained report.
- Confirm that the unit identifier on the IBC matches the identifier on the report or controlled record index.
- Keep the records at each location where periodic tests are conducted until the tests are successfully performed again or for at least 2.5 years from the last test.
- Make the records available for inspection by a Department of Transportation representative on request.
- If the shipper is not the owner or lessee, define who retains the records and how the shipper obtains current evidence; do not assume that a supplier certificate shifts a regulatory duty.

Use this checklist before filling or offering a liquid IBC for hazardous-material transportation. A checked box should reflect a physical marking and a retained record that can be matched to the same IBC.

- ☐ The IBC owner or lessee and the record custodian are identified.
- ☐ The IBC has a readable unit identifier that distinguishes it from every other IBC.
- ☐ The same identifier appears on the retained report or controlled record index.
- ☐ The leakproofness-test and inspection dates on the IBC agree with the report.
- ☐ The report contains all required facility, person, test, inspection, and result information.
- ☐ The prescribed retest and inspection are current before the IBC is filled and offered for transportation.
- ☐ The retention location and retention period are assigned and documented.
- ☐ The record can be produced for a Department of Transportation inspection on request.
- ☐ Any missing, unreadable, mismatched, or overdue item is resolved before use.

EVALUATION RESULT

If the physical marking cannot be matched to a complete, current record for that individual IBC, pause filling or offering the packaging until the discrepancy is resolved.

Primary references and document control

Primary reference: 49 CFR 180.352, Requirements for retest and inspection of IBCs - <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C/part-180/subpart-D/section-180.352>

Primary reference: 49 CFR 178.703, Marking of IBCs - <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C/part-178/subpart-N/section-178.703>

Related shipper references: 49 CFR 173.35, Hazardous materials in IBCs, and 49 CFR 173.22, Shipper's responsibility - <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C/part-173>

General educational information only. Customers remain responsible for determining ownership or lease status, packaging authorization, test currency, record retention, and compliance with the current Hazardous Materials Regulations.

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