



Periodic Tests and Inspections

Understand the clock, the work and the evidence

THE CLEAN TANK STANDARD

Do not reduce continued qualification to a date sticker. The applicable test and inspection must be performed correctly, the IBC must pass, the marks must be updated, and the supporting record must exist.

01 The basic schedule for liquid composite IBCs

WHEN	REQUIREMENT	KEY POINT
Before first use	Leakproofness test and initial external inspection	Production qualification and marking requirements also apply.
Every 2.5 years	Leakproofness test plus external visual inspection	Intervals run from manufacture or a qualifying repair date.
At least every 5 years	Internal inspection	Checks the interior for damage and continued ability to withstand applicable tests.
Before each filling/reuse	External visual inspection by the person filling	Separate user duty; periodic testing does not replace it.

02 Past due means stop

A specification IBC whose prescribed periodic retest or inspection is past due may not be filled and offered for transportation until the requirement has been successfully completed. The rule contains a limited exception for an IBC filled before the due date.

- A date alone does not show that the work was completed correctly.
- Failure is not cured by applying a new date; the IBC must pass.
- The customer must not rely on a general promise when a specific IBC's status is uncertain.



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What the 2.5-year external inspection covers

- Required markings are present, legible and restored if missing or damaged.
- Service equipment is functional and free from damage that may cause failure.
- The IBC has no cracks, warpage, corrosion or other damage that may make it unsafe.
- For a composite IBC, the inner receptacle is removed from the outer body for inspection unless bonded or the outer construction makes removal impossible without impairing integrity.
- A defective inner receptacle is replaced in accordance with the repair requirements or the IBC is removed from service.

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Leakproofness test essentials

ELEMENT	FEDERAL BASELINE
Medium	Air
Gauge pressure	Not less than 20 kPa (2.9 psig)
Duration	A suitable length of time
Detection	Soap solution/water, heavy oil or another equally effective method
Pass criterion	No leakage of air
Closures	Periodic test under 180.352 does not require closures to be fitted

SALES IMPLICATION

Do not promise that a pressure reading alone proves compliance. The test method, detection method, pass/fail result, equipment/process control and record all matter.



05 **Markings and records are different evidence**

EVIDENCE	WHAT IT SHOULD ESTABLISH
IBC marking	Latest leakproofness test date and latest inspection date, plus required repair or maintenance party information where applicable.
Underlying record	Design type/specification, dates, facility, person conducting the work, test/inspection details and results.
Clean Tank certificate	Customer-facing summary tied to the physical IBC through Clean Tank's unique identifier.

06 **How to discuss periodic status**

WEAK STATEMENT	CONTROLLED STATEMENT
'It was recertified.'	'This IBC passed the applicable leakproofness test and inspections on the documented date.'
'The sticker is current.'	'The physical marking is current and we maintain the underlying record tied to this unit.'
'You are covered for 2.5 years.'	'The periodic interval is one part of compliance; the filler still inspects condition before each use and must use the package correctly.'

ESCALATE

Unclear manufacture/repair date, conflicting dates, illegible mark, damaged bottle or cage, incomplete record, failed test, unusual repair, or a customer request to ship after the due date.



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Knowledge check

1. What two recurring requirements generally apply every 2.5 years to a liquid composite IBC?
2. At what minimum pressure is the leakproofness test conducted?
3. Must the inner receptacle generally be removed for the external inspection?
4. Does current periodic testing eliminate the filler's pre-fill visual inspection?
5. Can an overdue empty IBC be filled and then tested later?

ANSWER KEY

1. Leakproofness test and external visual inspection. | 2. 20 kPa (2.9 psig) gauge or higher. | 3. Yes, unless bonded or removal is impossible without impairing the outer body. | 4. No. | 5. No; the required test/inspection must be successfully completed before filling and offering it.

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Regulatory basis and source links

The current Hazardous Materials Regulations control. These links were checked for this revision on September 17, 2026.

- [49 CFR 180.352 - Retest and inspection of IBCs](#)
- [49 CFR 178.813 - Leakproofness test](#)
- [49 CFR 173.35 - Initial use and reuse](#)