



Traceability and Documentation

Connect the physical IBC to evidence of the work performed

THE CLEAN TANK STANDARD

The federal rule requires records for each packaging but does not prescribe Clean Tank's numbered-tag method. Our unique identifier is the control that makes an individual IBC's record practical to retrieve, explain and defend.

01 What the federal record must include

- 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 work.
- Test and inspection specifics and results.

02 Retention rule

Records are kept for each packaging at each location where periodic tests are conducted until the tests are successfully performed again or for at least 2.5 years from the date of the last test. They must be available to the Department of Transportation on request.

DO NOT OVERSTATE

A date written on an IBC is a required marking; it is not the complete test and inspection record. Conversely, a record that cannot be reliably associated with the physical IBC provides weak operational traceability.



03 Clean Tank's unit-level control

CONTROL	PURPOSE
Unique numbered tag	Creates a stable key for the physical IBC.
Production/test record	Captures the required test, inspection and repair details.
Customer certificate	Presents a usable summary without replacing the underlying record.
Physical periodic marking	Shows current test/inspection dates on the IBC as required.
Document retrieval process	Allows Clean Tank to locate records by tag when a customer or regulator asks.

04 Minimum Clean Tank record logic

- Identify the unit before work begins; do not assign the same active identifier to two IBCs.
- Capture original manufacturer/design-type information and applicable manufacture date.
- Record whether work was maintenance, repair, periodic test/inspection or a combination.
- Record parts replaced and confirm design-type conformity where repair is involved.
- Record test method, pressure, result, inspection scope, date, facility and responsible person.
- Apply required physical markings and verify that record and marking agree before release.

DOCUMENT CORRECTION

Never erase or silently overwrite an error. Preserve the original entry where practical, identify the correction, date it and make the responsible person clear.



05 **Customer-facing proof hierarchy**

CUSTOMER QUESTION	BEST EVIDENCE
When was this unit tested?	Physical mark plus the record/certificate for the unique tag.
What was actually done?	Underlying test and inspection details, not just a pass statement.
Which IBC does this certificate cover?	Matching Clean Tank tag on the IBC and document.
Was the bottle replaced?	Repair/work record identifying the component and conformity basis.
Who performed the work?	Facility and responsible person information in the record.

06 **Sell traceability without making accusations**

USE	AVOID
'How does your current supplier connect a certificate to the particular IBC?'	'Their paperwork is fake.'
'Our numbered tag lets us retrieve the supporting record for that unit.'	'DOT requires every composite IBC to have our kind of serial tag.'
'The marking and the retained record serve different purposes.'	'A sticker by itself is always illegal.'
ESCALATE Missing tag, duplicate tag, mismatch between certificate and IBC, altered date, missing original design-type information, incomplete result, customer request to backdate paperwork, or any record that cannot be substantiated.	



Q

Knowledge check

1. Does 49 CFR 180.352 expressly require Clean Tank's unique numbered tag format?
2. Name three required record elements.
3. How long are periodic-test records retained?
4. Is the physical date marking the complete record?
5. What is the primary value of the Clean Tank tag?

ANSWER KEY

1. No; it is Clean Tank's method for meeting and strengthening unit-level traceability. | 2. Any three: design type/specification, dates, facility, persons, test/inspection specifics and results. | 3. Until successfully performed again or at least 2.5 years from the last test. | 4. No. | 5. It connects the physical IBC to its supporting work and testing record.

S

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\(g\) - Record retention](#)
- [49 CFR 178.703 - IBC marking requirements](#)