



Customer and Shipper Responsibility

A tested IBC is not automatically authorized or correctly used

THE CLEAN TANK STANDARD

Clean Tank accurately represents the IBC and helps the customer identify technical questions. The customer/offoror remains responsible for classifying the material, selecting an authorized and compatible packaging, filling and closing it correctly, and inspecting it before use.

01 Responsibility does not stop at the supplier

CLEAN TANK SUPPLIES	CUSTOMER/OFFEROR MUST DETERMINE AND PERFORM
Accurate product description, configuration, applicable test/inspection evidence and known limitations.	Hazard classification, proper shipping name, UN/NA number, packing group and applicable special provisions.
Manufacturer/design-type information and available closure instructions.	Whether the packaging is authorized and compatible for the exact lading and transportation mode.
A product meeting the represented Clean Tank condition and service level.	Correct filling, outage, closure, securing, marking/labeling and pre-fill inspection.

02 The salesperson's role

- Ask enough questions to reveal when regulated transportation and technical selection matter.
- Gather exact information; do not classify a product from a trade name or casual description.
- Explain the IBC and Clean Tank's work accurately.
- Escalate the technical determination instead of giving an improvised approval.



03 Customer duties that affect the package	
DUTY	WHY IT MATTERS
Authorized packaging	The IBC must be permitted for the material under the applicable HMR entry and special provisions.
Compatibility	The offeror must consider corrosion, permeability, softening, premature aging, embrittlement, gaskets and service equipment.
Pre-fill inspection	The filler inspects the IBC and service equipment for damage and required markings before filling and offering it.
Closure	Specification packaging must be closed with applicable components and according to the manufacturer's instructions.
Outage	For liquids in IBCs, sufficient ullage is required so the mean bulk temperature at 50 C does not exceed 98% of water capacity.
Pressure/gross mass	Vapor pressure, static pressure, test pressure and maximum gross mass can limit use.
ABSOLUTE STOP No IBC may be filled with a Packing Group I liquid under 49 CFR 173.35(j). An X performance mark does not override this restriction.	



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Minimum information for a technical review

- Exact product and current SDS, with attention to Section 14 transportation information.
- Proper shipping name, identification number, hazard class/division and packing group if known.
- Concentration, mixture information, density/specific gravity and fill temperature.
- Transportation mode and whether the container will actually enter transportation in commerce.
- Required capacity, quantity, closure, valve, gasket and venting needs.
- Any elevated temperature, vapor pressure, reactive or permeation concern.

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A safe response sequence

STEP	SALES ACTION
1	Clarify the exact product and use.
2	Ask whether it is regulated and will be transported.
3	Obtain the customer's classification and packaging requirement.
4	Identify the proposed Clean Tank IBC and any known limits.
5	Escalate compatibility, authorization, SG/pressure or unusual closure questions.
6	Document the recommendation and any assumptions.

APPROVED PHRASE

'We can identify the IBC and provide its testing information. Your hazmat team is responsible for the material classification and final packaging authorization; I will verify the container details you need for that decision.'



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Knowledge check

1. Who is responsible for compatibility of the packaging with the hazardous material offered for transportation?
2. Does periodic testing replace the filler's pre-fill visual inspection?
3. What is the maximum fill condition stated in 173.35(d) at a mean bulk temperature of 50 C?
4. Can an X-marked IBC carry a Packing Group I liquid?
5. What should a salesperson do with an uncertain chemical-compatibility question?

ANSWER KEY

1. The person offering the hazardous material for transportation. | 2. No. | 3. Not more than 98% of water capacity. | 4. No. | 5. Collect exact information and escalate; do not guess or approve 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 173.24 - General package requirements and compatibility](#)
- [49 CFR 173.35 - Hazardous materials in IBCs](#)
- [49 CFR 173.22 - Shipper's responsibility](#)