

**DOT Requirements for Portable Refillable Pesticide Containers: At A Glance (Draft as of 1/11/12)**

	Portable Refillable Containers (PRCs) Larger than 119 Gallons				PRCs that are 119 Gallons or Smaller			
	PRC is marked with UN symbol & DOT specification marks (called intermediate bulk containers or IBCs by DOT regs)		PRC is NOT marked with UN symbol & DOT specification marks (called non-DOT Specification portable tanks by DOT regs)		PRC must be marked with UN symbol & DOT specification marks (called nonbulk packagings by DOT regs)			
	The pesticide is a DOT hazardous material.	The pesticide is NOT a DOT hazardous material.	The pesticide is a DOT hazmat.	The pesticide is NOT a DOT hazardous material.	The pesticide is a DOT hazardous material.	The pesticide is NOT a DOT hazardous material.		
<b>Key EPA refillable container requirements [40 CFR 165.45, 165.70(f) &amp; 165.70(i)]</b>	<ul style="list-style-type: none"> <li>- Meet DOT requirements that EPA adopted</li> <li>-Marked with serial number or identifying code</li> <li>-Tamper-evident device or one-way valve on openings</li> <li>-On registrant's description of acceptable containers</li> <li>- Properly labeled</li> <li>- Be sound (pass visual inspection)</li> </ul>		EPA is not aware of any pesticides (that are DOT hazardous materials) that are authorized to be transported in non-DOT Specification portable tanks by the DOT regulations.	<ul style="list-style-type: none"> <li>- Meet DOT requirements that EPA adopted</li> <li>-Marked with serial number or identifying code</li> <li>-Tamper-evident device or one-way valve on openings</li> <li>-On registrant's description of acceptable containers</li> <li>- Properly labeled</li> <li>- Be sound (pass visual inspection)</li> </ul>		<ul style="list-style-type: none"> <li>- Meet DOT requirements that EPA adopted</li> <li>-Marked with serial number or identifying code</li> <li>-Tamper-evident device or one-way valve on openings</li> <li>-On registrant's description of acceptable containers</li> <li>- Properly labeled</li> <li>- Be sound (pass visual inspection)</li> </ul>		
<b>What does "meet DOT requirements that EPA adopted" mean?</b>	The pesticide is a DOT hazmat, so container must comply with all relevant DOT regs. [49 CFR Parts 171-180; 40 CFR 165.45(b)]	Container must be designed, constructed & marked to comply with at least DOT Packing Group (PG) III requirements. Look for UN symbol & X, Y or Z. [40 CFR 165.45(a)]		EPA regs adopt 49 CFR 173.241(c), which authorizes the use of non-DOT Specification portable tanks (which do not require marking or compliance with DOT performance tests). [49 CFR 173.241(c), 165.45(a)]	The pesticide is a DOT hazmat, so container must comply with all relevant DOT regs. [49 CFR Parts 171-180; 40 CFR 165.45(b)]	Container must be designed, constructed & marked to comply with at least DOT Packing Group (PG) III requirements. Look for UN symbol & X, Y or Z. [40 CFR 165.45(a)]		
<b>How can the PRC be identified on registrant's description of acceptable containers to show that the PRC meets the DOT requirements described above?</b>	<ul style="list-style-type: none"> <li>- Identify specific types of containers that comply with all relevant DOT regs, e.g., provide photos, model numbers, detailed descriptions.</li> <li>- Identify performance standards for containers that comply with all relevant DOT regs, e.g., composite IBCs that meet at least PG II standards.</li> </ul>	<ul style="list-style-type: none"> <li>- Identify specific types of containers that comply with at least DOT PG III standards, e.g., provide photos, model numbers, detailed descriptions.</li> <li>- Identify performance standards, e.g., composite IBCs that meet at least PG III standards.</li> </ul>		<ul style="list-style-type: none"> <li>- Identify specific types of containers that the registrant identifies as "non-DOT Specification portable tanks suitable for transport of liquids," e.g., provide photos, model numbers, detailed descriptions. [Note: If the registrant's description of acceptable containers specifies "Meets PG III standards", these containers CANNOT be used.]</li> </ul>	<ul style="list-style-type: none"> <li>- Identify specific types of containers that comply with all relevant DOT regs, e.g., provide photos, model numbers, detailed descriptions.</li> <li>- Identify performance standards for containers that comply with all relevant DOT regs, e.g., HDPE closed head drums that meet at least PG II standards.</li> </ul>	<ul style="list-style-type: none"> <li>- Identify specific types of containers that comply with at least DOT PG III standards, e.g., provide photos, model numbers, detailed descriptions.</li> <li>- Identify performance standards, e.g., HDPE closed head drums that meet at least PG III standards.</li> </ul>		
<b>Is a leakproofness test required?</b>	Yes, every 2.5 years (+ mark container & keep records) [49 CFR 180.352(b)(1), (f) & (g) and 178.703]		Not required. DOT requirements in 49 CFR 180.352 apply to IBCs, not non-DOT Specification portable tanks.	Yes, before each reuse (+ mark) [49 CFR 173.28(b)]	Not required because of an EPA exemption in 40 CFR 165.45(a)(2).			
<b>Is a DOT external visual inspection required?</b>	Yes, every 2.5 years (+ mark container & keep records) [49 CFR 180.352(b)(2) & (g) and 178.703]			Yes, before each reuse [49 CFR 173.28]				
<b>Is a DOT internal inspection required?</b>	Yes, at least every 5 years (+ mark container & keep records) [49 CFR 180.352(b)(3) & (g) and 178.703]			Not required. [This is not a requirement in DOT regs for nonbulk packagings.]				