

Alert 20-03: Marking of the Date on Steel Drums

Explanation of the two date marks placed on a steel drum during manufacture.

Occasionally, users of steel drums inquire as to whether or not the date required to be embossed on the bottom of a steel drum and then marked on the side must match, specifically the “year” mark.

The embossment of an incomplete UN mark on the bottom of a new steel drum is based on a UN requirement in 6.1.3.2 (see also the same paragraph in the International Maritime Dangerous Goods (IMDG) Code). The Code of Federal Regulations Title 49 §178.503(a)(10) states: This marking is intended as an aid for reconditioning and remanufacturing. The embossed mark is not intended as the drum’s UN certification mark, which is required to be on the side in the case of a packaging with a mass of more than 30kg/L.

The complete mark is normally placed on the side after full assembly and leak testing or after reconditioning or remanufacture. In most circumstances, new drums are manufactured and marked noting the same year in both marking locations as drums are generally made to order. In some cases, the drum’s bottom may be cut and embossed prior to final assembly or completion of manufacture of the packaging. In that case, the year embossed on the bottom and side may differ. This is acceptable since the complete mark indicating final assembly is located on the side of the drum is the mark that is the manufacturer’s certification mark (see 178.2(b)). So, if the drum bottom was manufactured and embossed in 2019 but not assembled into a new drum and leak tested until 2020, then the markings could conflict. Reconditioned or remanufactured drums normally have conflicting marks as the person who reconditions the drum must apply a new complete mark.

Issued 11/2020

The information above is intended to provide interpretative and authoritative information as a service to our members and has been offered in good faith, based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information.

