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Transportation/Hazardous Materials: U.S. Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Training Requirements

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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in a September 24th Interpretive Response Letter ("IRL") a question regarding the Hazardous Materials Regulations ("HMR") applicable to training requirements.

PHMSA was responding to an April 15th query from the North American Transportation Consultants, Inc. ("NATC").

NATC asked:

...whether the exceptions provided in § 172.704(e)(1) apply to manufacturing personnel such as welders and other employees who work on both hazmat and non-hazmat packagings?

PHMSA responded in the affirmative, noting:

...Personnel engaged in manufacturing of packagings used to transport hazardous materials in commerce, such as welders, are considered hazmat employees and subject to training.

They are stated to be subject to "general awareness, function-specific, and security training as outlined in § 172.704(a)(1), (a)(2), and (a)(4).

Nevertheless, the IRL states that in accordance with § 172.704(e), for manufacturing personnel that are not handling or potentially exposed to hazmat during the course of performing their job functions, the safety training in § 172.704(a)(3) is not required.

A copy of the IRL can be downloaded [here](#).