



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

September 24, 2024

John F. Christman  
Certified Logistics Practitioner  
North American Transportation Consultants, Inc.  
P.O. Box 1404  
Hightstown, NJ 08520

Reference No. 24-0026

Dear Mr. Christman:

This letter is in response to your April 15, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to training requirements. Specifically, you ask 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.

The answer is yes. Personnel engaged in manufacturing of packagings used to transport hazardous materials in commerce, such as welders, are considered hazmat employees and subject to training. Specifically, they are subject to general awareness, function-specific, and security training as outlined in § 172.704(a)(1), (a)(2), and (a)(4). However, 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. The required trainings may be provided by company training programs, consultative services (e.g., training firm colleges and universities, or Federal or State agencies), or through the completion of self-guided training.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen".

Dirk Der Kinderen  
Chief, Standards Development Branch  
Standards and Rulemaking Division

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Request for Interpretation  
**Date:** Friday, April 19, 2024 9:38:01 AM  
**Attachments:** [Request for Clarification.pdf](#)  
**Importance:** High

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Hi Alice,

Please see the attached interpretation request.

Let me know if you need anything.

Regards,

-Breanna

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**From:** John Christman <jchristman@natc-inc.com>  
**Sent:** Monday, April 15, 2024 10:08 AM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Cc:** John Christman <jchristman@natc-inc.com>; JP Gibbons <jpgibbons@natc-inc.com>  
**Subject:** Request for Interpretation  
**Importance:** High

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Please see my request attached.

**I would appreciate a return email to let me know my request has been received.**

Thank You,

**John F. Christman**  
**Certified Logistics Practitioner**  
[jchristman@natc-inc.com](mailto:jchristman@natc-inc.com)  
**Phone (609)426-0555**

**Fax (609)443-0004**

**NATC**

[www.49cfr.com](http://www.49cfr.com)



**April 15, 2024**

**Office of Pipeline Safety (PHP-30)  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
1200 New Jersey Ave. S.E.  
Washington, DC 20590-0001**

**To whom it may concern:**

**I would like to request an official Request for Clarification from PHMSA on the following under Section 172.704 (e):**

**Does 49 CFR 172.704 (e) include new manufacturing personnel such as welders and others who work on both HazMat and non-HazMat packaging or just the engineers who design the packaging and those who are responsible for inspecting and certifying the package for HAZARDOUS Material transportation under 49 CFR?**

**[Please email your response to JChristman@natc-inc.com](mailto:JChristman@natc-inc.com)**

**Regards,**

**John F. Christman,  
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