



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

August 18, 2026

Nate Allsop
Lead Hazmat
SSA Marine
11814 S Election Rd # 210
Draper, UT 84020

Reference No. 26-0024

Dear Mr. Allsop:

This letter is in response to your January 29, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the preparation and maintenance of a dangerous cargo manifest (DCM). You provided a scenario where a customer (*i.e.*, a vessel carrier) intends to provide SSA Marine, the marine terminal operator, with only a copy of the DCM, rather than a full dangerous goods documentation package (including shipping papers). You ask whether § 176.30 of the HMR requires the marine terminal operator to maintain a copy of the DCM or the full shipping documentation while a vessel is in port.

No. Section 176.30 requirements apply to vessel carriers. However, there are documentation requirements for facilities where hazardous material transportation occurs. Under the HM-223 final rule, “storage incidental to movement” is explicitly defined as storage by any person between the time a carrier takes physical possession of the material and its final delivery (*see* § 171.1(c)(4)).¹ The rule clarifies that the temporary holding of hazardous material at a marine terminal, pending the arrival of a vessel onto which it will be loaded or prior to inland movement, constitutes storage incidental to movement. Thus, in such a case where hazardous material is stored incidental to movement, a marine terminal is considered a facility operator and is subject to maintenance of emergency response information (ERI) in accordance with § 172.602(c)(2).

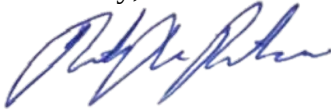
Because marine terminals operate in this continuous chain of custody, your facility is regulated under the HMR as a facility operator. As previously clarified in letter of interpretation (LOI) Reference No. 07-0039, the dangerous goods list requirements in § 176.30 and paragraph 5.4.3 of Part 5 of the International Maritime Dangerous Goods (IMDG) Code “apply only to hazardous

¹ 68 FR 61906, 61920 (Oct. 30, 2003).

materials loaded on board a ship. Once a container is unloaded at a terminal...there is no requirement other than the emergency response information requirement specified in § 172.602(c)(2).” Under § 172.602(c)(2), facilities that receive, store, or handle hazardous materials during transportation must maintain ERI in a location that is immediately accessible to facility personnel. The ERI must include the basic description and technical name as required by § 172.602(a), whenever the hazardous material is present. Since terminal operators must know exactly where each container is located and what hazards are inside for emergency response purposes, possessing shipping documentation is a practical means to satisfy ERI requirements. In addition to the ERI requirements under § 172.602(c) applicable to facility operators where hazardous materials transportation occurs, please note that hazardous cargo at a marine terminal also falls under the jurisdiction of the U.S. Coast Guard (USCG) regulations which include operational requirements for marine terminals (see 33 CFR Part 126). Questions regarding any specific documentation required by those regulations should be directed to the USCG.

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

Sincerely,



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

From: [Nathan Allison](#)
To: info.cntr@dot.gov; [Baker, Yul \(PHMSA\)](#); [Hazmat](#)
Cc: [Bob Salter](#)
Subject: Hazmat Documentation / Manifest (DCM) letter of interpretation
Date: Thursday, January 29, 2026 12:34:03
Attachments: [image001.png](#)
[SSA MARINE MTO.pdf](#)

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Good morning,

To whom it may concern,

I'm, requesting a letter of interpretation in the regards to our Terminals (SSA Marine) receiving the Import DG Manifest and DG Documents to be easily accessible to all personal that encounters and works with DG on the dock.

the current regulation states the below, but we have a Steam Ship Line (HLC) that is only wanting to send the DG Manifest (DCM) when they have been sending both for years.

The Terminal has expressed that they need the DG Docs to be easily accessible any time of the day in any case there are any incidents or questions with DG cargo.

- **Dangerous Cargo Manifest/List (IMDG/49 CFR):**

- Required for all vessels carrying hazardous goods.
- Must be kept on or near the bridge but can move to the cargo office when docked at a U.S. port, with a sign indicating its location.
- Must always be readily accessible to emergency responders.

Key Requirements of 49 CFR § 176.30

- **Document Required:** A dangerous cargo manifest, list, or stowage plan must be created for hazardous materials.
- **Content:** Must include vessel name, nationality, cargo details (name, hazard, quantity, stowage), and emergency contact info.
- **Accessibility:** Kept on or near the bridge (or designated spot in U.S. ports with a sign) for emergency personnel. – I would think this applies to the Terminal having a copy on hand
- **Barge Specifics:** For barges, the person loading prepares it, an individual is designated, it must be on board, and a copy goes to the tow vessel.

Exclusions: Cannot list non-hazardous materials or items not subject to HMR/IMDG Code

Also, SSA Marine has a MTO (Marine Terminal Operator) Regulations and Practices. Page 18 (5)

Please see the attached.

compliance with Hazmat laws. Each Bill of Lading respecting the goods must contain a shipper certification as required by HazMat laws.

- (5). Shipping Papers: Customer shall be solely responsible for providing Operator with complete, comprehensive and approved shipping papers with respect to any hazardous goods tendered hereunder, which papers shall include all information, descriptions, instructions, disclosures and documentation required by HazMat laws and a full description and identification of the hazardous goods, including their type, quantity, proper shipping name, classification, packing group, chemical group, identification number(s) and hazardous and subsidiary hazardous nature(s).

Without limiting the foregoing, Customer shall obtain and provide the following to Operator prior to the performance of any terminal services whatsoever: registration under 49 U.S.C. §5108 as an offeror of hazardous goods for interstate transportation (or an applicable federal approval/exemption); full name and street address, telephone and contact name for the owner, shipper/consignor and consignee of the hazardous goods; a full description of the hazardous goods, as above; booking confirmation number(s); complete and clear written instructions for the loading, handling, storing, movement, transportation and unloading of the hazardous goods as well as for response, clean-up, mitigation, remediation, alleviation, removal and restoration in the event of a spill or release; and the full name, address and telephone number for a contact person who has comprehensive knowledge with respect to the hazardous goods, including their hazardous nature and emergency incident response requirements. The contact person must be immediately available at all times during the performance of terminal services; his/her telephone number must be available and monitored at all times, and must not be a beeper number or otherwise involve any answering or call-back service.

- (6). **Hazardous Waste.** If the hazardous goods include hazardous waste. Customer must give prior written

Thank you for your consideration in this matter.

Thank you & Take care,

Nate Allsop

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Any revisions to hazardous information, commodities, piece counts, weights, etc. please notify by email and send the revised declaration noting the item or items being revised. After Haz Declarations have been received and approved the EDI is blocked to ensure the integrity of the hazardous information. If booking changes are necessary, vessel/voyage, POD, they need to be manually updated in the terminal system. If a Haz booking is changing to NON-Haz we will also need to be notified via email of the change so the EDI can then be unblocked and Haz information removed.

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Failure to provide a complete, accurate and legible hazardous declaration at least 3 hours before the container arrives at the terminal may result in delays, the cost of which would be your responsibility.