



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

July 25, 2023

Mr. Hüseyin Demir
Maintenance Engineer
Total Technic
Ataturk International Airport
34149 Istanbul, Turkey

Reference No. 22-0116

Dear Mr. Demir:

This letter is in response to your October 27, 2022, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to training requirements. We have paraphrased and answered your questions as follows:

- Q1. You ask whether revisions to a special permit used by your employees necessitates an updated training of your hazmat employees.
- A1. Section 172.704(a)(2) requires that each hazmat employee must be provided function-specific training concerning requirements of the HMR—or exemptions or special permits issued under subchapter A—that are specifically applicable to the functions the employee performs. As such, if the Pipeline and Hazardous Materials Safety Administration adopts a new regulation, changes an existing regulation, or revises a special permit that relates to a function performed by a hazmat employee, the employee must be instructed on those changes as needed. While it is not necessary to completely retrain the hazmat employee sooner than the required three-year cycle, the employee must receive the instruction necessary to ensure this person is knowledgeable about the new or revised regulatory requirement including changes to applicable special permits.
- Q2. In your email, you describe a scenario in which one of your hazmat employees (Employee #1) conducts the training for all other hazmat employees (Employees #2-10) in your company. You ask whether Employee #1 may self-train or must be trained by another person.

A2. Employee #1 may self-train, provided the general awareness/familiarization training, function specific training, safety training, security awareness training, in-depth security training, testing, recordkeeping, and certification requirements specified in § 172.704 are met.

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

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Pollack

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Subject: FW: DOT-SP TRAININGS
Date: Thursday, October 27, 2022 12:53:22 PM
Attachments: [image001.png](#)
[image006.png](#)

22-0116

Hi Alice,

Please see the below interpretation request.

Let me know if you need anything else.

Regards,

-Breanna

From: Hüseyin Demir <huseyin.demir@totaltechnic.aero>
Sent: Thursday, October 27, 2022 9:29 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>; INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Engineering Department <engineering@totaltechnic.aero>
Subject: RE: DOT-SP TRAININGS

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.

Dear responsible, accordance with 49 CFR 105.20, I added infocntr@dot.gov, in mail list.

To clear my question, I write it below again.

How is DOT-SP revision change trainings is mandatory. I mean, when there is a DOT-SP revision changed. Is it compulsory to train HAZMAT Employees every time.

The second question is. We have a trainer Mr. Sadik. He is an also HAZMAT Employee, he works as Certifying staff in Oxygen Workshop. As far as I am informed. He can train other employees. But Is it compulsory for him to be trained by third person. And is it compulsory to be every time.

According to your web page: <https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center>

There is a information saying “To request a formal letter of interpretation or to mail your question, write to: Mr. Shane Kelley”

So how can I forward this e-mail/question to him? There is not any specific e-mail account for him.

Saygılarımla/Best regards,

Hüseyin DEMİR
Maintenance Engineer



SHGM TR.145.086 | EASA.145.0530 | FAA Part 145 No 6TVY457C

Ataturk International Airport, 34149 Istanbul, Turkey

Ph: +90 (212) 465 28 65 (ext:1145) | Fx: +90 (212) 663 00 11

Mb:+90 (544) 835 97 10

www.total-technic.com

huseyin.demir@totaltechnic.aero

From: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Sent: Wednesday, October 26, 2022 10:09 PM

To: Hüseyin Demir <huseyin.demir@totaltechnic.aero>

Subject: RE: DOT-SP TRAININGS

Dear Hüseyin,

Attached is the document that you requested. Additionally, you can access the Code of Federal Regulations at www.ecfr.gov. I hope that this information is helpful.

You may contact the Hazardous Materials Information Center, which is staffed with regulatory specialists who can quickly answer your questions by phone, Monday through Friday, 9 AM - 5 PM EST ator +1 (202) 366-4488.

Sincerely,

Breanna
Hazardous Materials Information Center

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. <https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center>

From: training (PHMSA) <training@dot.gov>

Sent: Wednesday, October 26, 2022 9:07 AM

To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Subject: FW: DOT-SP TRAININGS

Hi Info center,
Can you please assist Hüseyin?

Thanks,

Peter Heitzmann

[Communications](#)

US Department of Transportation

Pipeline and Hazardous Materials Safety Administration

1200 New Jersey Avenue SE, Washington, DC, 20590

Mobile: 202.366.4425

[PHMSA Home](#) | [LinkedIn](#) | [Twitter](#) | [HAZMAT](#) | [OHMS](#)



Know what's below.
Call before you dig.



From: Hüseyin Demir <huseyin.demir@totaltechnic.aero>

Sent: Thursday, October 20, 2022 5:57 AM

To: training (PHMSA) <training@dot.gov>

Cc: 'engineering@total-technic.com' <engineering@total-technic.com>

Subject: DOT-SP TRAININGS

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.

Dear responsible; We are an aviation company with requilifier identification number (RIN: 1514)

We have an issue about DOT-SP Revisions.

How is DOT-SP revision change trainings is mandatory. I mean, when there is a DOT-SP revision changed. Is it compulsory to train HAZMAT Employees every time.

The second question is. We have a trainer Mr. Sadık. He is an also HAZMAT Employee, he works as Certifying staff in Oxygen Workshop. As far as I am informed. He can train other employees. But Is it compulsory for him to be trained by third person. And is it compulsory to be every time.

Saygılarımla/Best regards,

Hüseyin DEMİR

Maintenance Engineer



SHGM TR.145.086 | EASA.145.0530 | FAA Part 145 No 6TVY457C

Ataturk International Airport, 34149 Istanbul, Turkey

Ph: +90 (212) 465 28 65 (ext:1145) | Fx: +90 (212) 663 00 11

Mb:+90 (544) 835 97 10

www.total-technic.com

huseyin.demir@totaltechnic.aero