



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

September 28, 2023

Mr. John Grinley  
WMG Inc.  
5391 Lakewood Ranch Blvd  
Suite 302  
Sarasota FL 34240

Reference No. 23-0057

Dear Mr. Grinley:

This letter is in response to your June 6, 2023, email and a subsequent phone conversation with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to training requirements. Specifically, you ask whether training on the software used to generate hazardous materials shipping papers must be provided to a hazardous materials (hazmat) employee in accordance with the “Function-specific” training requirements specified in § 172.704(a)(2).

The answer is yes. Function-specific training is required for the function(s) for which a hazmat employee is responsible. Therefore, if a hazmat employee must use a specific software to perform functions pertaining to the requirements of the HMR - such as classifying materials or generating hazardous materials shipping papers – the hazmat employee must be trained on that software.

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".

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

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Hazmat Interps](#)  
**Subject:** FW: Clarification of Training Requirements  
**Date:** Tuesday, June 27, 2023 11:30:12 AM

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23-0057

Hello,

Please below request for interpretation.

Thanks,  
Jonathon

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**From:** John Grinley <jgrinley@wmginc.com>  
**Sent:** Tuesday, June 6, 2023 11:49 AM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Cc:** J. Michael Reeves <jmreeves@wmginc.com>  
**Subject:** Clarification of Training Requirements

**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.

When a shipper uses a software program to characterize radioactive material and/or waste and to also generate paperwork associated with these shipments, I believe that training on the use of this software is required according to 49 CFR 172.704(a)(2) "Function-specific training", as stated, *"that are specifically applicable to the functions the employee performs"* and the RADMAN software is a cornerstone of many nuclear power plants radioactive waste/material shipping programs. Using the software is a specific function to creating the documentation needed to ship this material/waste to a licensed facility for use, processing and/or disposal. Can you please confirm I am correct in my interpretation of this regulation.

Best Regards,

**John Grinley**  
**Training & Customer Service Manager**  
**WMG, Inc.**  
5391 Lakewood Ranch Blvd, Suite 302 | Sarasota | Florida | 34240  
Main: 914.736.7100 (New York Office)  
Desk: 914.370.8592 (Florida Office)  
Cell: 813.707.3080 (Florida)  
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