



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

Memorandum

Date: JUL 16 1998

Reply to Attn. of:

Subject: ACTION: Clarification of Training Requirements

Edward T. Mazzullo
From: Edward T. Mazzullo, Director,
RSPA Office of Hazardous Materials Standards

To: Charles Lovinski, Manager,
HAZMAT and Dangerous Goods Program

This is in response to your memo requesting clarification of employee (or contractor employee) training requirements. Your question is paraphrased and answered as follows:

Question: Are employees of (or contractor employees for) an airline who perform security functions related to cargo, including loading and unloading onto pallets and x-ray machines, opening for inspection, and transporting cargo that includes hazmat to the aircraft, required by the Hazardous Materials Regulations (HMR) to have function-specific training?

The answer to your question is yes. Both employees and contract employees of an airline who perform any function subject to the requirements of the HMR are required to be instructed in the requirements of the HMR that apply to those functions. Section 172.704 contains the requirements for the training of hazmat employees, one item of which is function-specific training (§ 172.704 (a) (2)). We also believe that this answer is consistent with the training requirements of the International Civil Aviation Organization's (ICAO) Technical Instructions.

I trust this satisfies your inquiry. If this office can be of further assistance, please contact us.

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U.S. Department
of Transportation
**Federal Aviation
Administration**

Memorandum

*Edmondson
File: 172.704*

Subject: **ACTION:** Dangerous Goods Training for Air
Carrier Employees

Date:

APR - 6 1998

From: Manager, Dangerous Goods & Cargo Security

Reply to
Attn. of:

To: Director, Office of Hazardous Materials Standards

The Division Manager in our Southern region, has asked for an interpretation for the following questions to the Hazardous Materials Regulations.

Are employees (or contractor employees) for an airline who perform security functions related to cargo required to have function specific training?

Their duties include loading, unloading cargo onto pallets and x-ray machines, opening cargo for physical inspection, and transporting cargo to the aircraft. The aforementioned cargo does include hazardous materials.

The ICAO Technical Instructions, Part 6, page 6-1-1 and page 6-1-2 details the international community's standards and expectations relative to the kind of training required of certain employees. Should this ICAO requirements be taken into consideration when answering the above questions?

W Wilby
for Charles Lovinski