



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

APR - 4 2000

Ms. Julie Brown
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Eastman Chemical Company
P.O. Box 431
Kingsport, TN 37662-5280

Ref. No. 00-0080

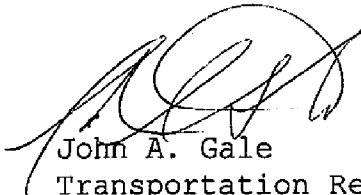
Dear Ms. Brown:

This is in response to your letter dated March 15, 2000, requesting clarification of the provisions in § 172.704(d) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask how long training records must be retained by a hazmat employer for each hazmat employee.

Section 172.704(d) requires that a record of current training, inclusive of the past three years, be kept by each hazmat employer for each hazmat employee while that employee is employed as a hazmat employee and for 90 days thereafter. This means each hazmat employer is required to retain the most current training records and the training records from the previous three year training cycle.

I hope this satisfies your request.

Sincerely,



John A. Gale
Transportation Regulations Specialists
Office of Hazardous Materials Standards



000080

172.704

Eastman Chemical Company
P. O. Box 431
Kingsport, Tennessee 37662

EASTMAN

March 15, 2000

BDH
§ 172.704
00-0080

Mr. Edward Mazzullo
Office of Hazardous Materials Standards
Research and Special Programs Administration
400 Seventh Street, SW, DHM-10
Washington, DC 20590

RE: Request for interpretation

Dear Mr. Mazzullo:

Please clarify what DOT means by the wording in 172.704(d) under Recordkeeping with regards to "inclusive of the proceeding three years.....for as long as that employee is employed". Should the employer keep all training records from every year that the employee trains, or two sets of training records(current and the previous) or just the current training record? Thank you for your help in understanding exactly what DOT requires.

Yours very truly,



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