



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

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

MAY 4 2000

Ref. No. 00-0100

Mr. David Norton  
Northrop Grumman  
P.O. Box 655907 M/S 93-01  
Dallas, Texas 75265-5907

Dear Mr. Norton:

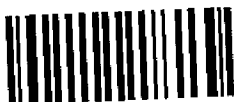
This is in response to your letter dated March 29, 2000, requesting clarification on the training requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether persons certifying hazardous materials shipments by aircraft require training in the use of both the International Air Transport Association's (IATA) Dangerous Goods Regulations and the HMR.

Section 172.702 requires that a hazmat employer ensure that each of its hazmat employees is trained in accordance with the HMR. Section 172.704(a)(2)(ii) provides that as an alternative to function-specific training on the requirements of the HMR, training on the requirements of the International Civil Aviation Organization's Technical Instructions and the International Maritime Dangerous Goods Code may be provided if such training addresses the functions authorized by §§ 171.11 and 171.12 of the HMR. Training may be provided by the hazmat employer or other public or private sources, including training classes that are offered by the IATA to the extent that the IATA training addresses the training specified in § 172.704, in order to avoid unnecessary duplication of training.

I hope this answers your inquiry.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



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Aerostructures

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**NORTHROP GRUMMAN**

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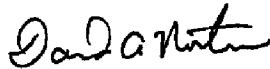
29 March 2000

U.S. Department of Transportation  
Office of Hazardous Materials Standards  
400 Seventh St. S.W.  
Washington, D.C 20590

Dear Sir,

If a company prepares dangerous goods using both IATA (air shipments) and CFR 49 (domestic surface shipments), must the person who provides the hazardous material instructions (classification, packaging, marking, and labeling/placarding, etc.) and who signs the certification have formal training in both IATA and CFR 49? Or, is only having IATA training considered sufficient with the provision that the person must also have a strong working knowledge of CFR 49 requirements?

Sincerely,



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