



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

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

JUN 12 2000

Mr. Larry Blalock
Office of Transportation
Department of Energy
Germantown, MD 20874-1290

Ref. No. 00-0118

Dear Mr. Blalock:

This is in response to your letter dated April 14, 2000, requesting an update on the initial and recurrent training requirements in § 172.704. The four questions you asked essentially involve two issues: 1) whether computer based training may be used to satisfy the training and recurrent requirements; and 2) whether an employee may successfully take a test and have the recurrent training requirement waived.

As stated in our previous response to you dated July 20, 1994, an employer may use any type of training method, including a computer based program, that ensures each hazmat employee receives general awareness/familiarization, function specific and safety training. Employees may be tested by any appropriate means on the training requirements specified in § 172.704. Recurrent training must cover the three primary areas as specified for initial training, i.e., general awareness/familiarization, function specific, and safety training. Therefore, an employee may not successfully take an exam and have the recurrent training requirement waived.

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

Sincerely,

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



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Germantown, MD 20874-1290

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Mr. Ed Mazzulo, Director
Office of Hazardous Materials Standards
Research and Special Programs Administration
U. S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

Dear Mr. Mazzulo:

With reference to our June 9, 1994, letter and your July 20, 1994, (copies enclosed for ease of reference) response concerning clarification of acceptable methods to meeting the initial and recurrent training requirement of 49 CFR 172.704, we would appreciate receiving an updated response to the following questions:

Question 1 - Is it acceptable, for initial training, for a new hire which has received training from a previous employer, but is unable to provide documentation, to "challenge" an exam(s) without receiving some type of instruction from the current employer prior to taking the exam(s)?

Question 2 - Is it acceptable, for recurrent training, for a current employee who has previously received initial training from his current hazardous material employer to "challenge" an exam(s) without receiving some type of additional instruction prior to taking the exam(s)?

Question 3 - Is it permissible to utilize computer based training (CBT), which includes an instruction section and an examination section, to meet the recurrent training requirements?

Question 4 - Is it acceptable, for recurrent training, for a hazardous material employer to use a computer based program to develop a test from a randomly selected predetermined number of questions from a large bank of relevant questions to "test-out" a current employee who has previously received initial training from this employer?



Your clarification of these matters is appreciated.

Sincerely,



Larry G. Blalock
Office of Transportation
Office of Integration and Disposition
Office of Environmental Management

Enclosures

cc:

- T. Mustin, EM-24
- M. Williams, DOE-AL
- Field Office Transportation Managers