



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

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

January 29, 2004

Major Mark P. Wyrosdick  
Chief of Safety  
Department of the Army  
Military Surface Deployment and Distribution Command Operations Center  
661 Sheppard Place  
Fort Eustis, VA 23604-1644

Ref. No. 04-0022

Dear Major Wyrosdick:

This is in response to your letter dated January 28, 2004 and subsequent conversations with Mr. Duane Pfund regarding the hazardous material documentation requirements of the IMDG Code for multi-modal shipments. Specifically you ask if the "Shipper's Declaration for Dangerous Goods" form utilized for the air mode of a shipment is authorized for onward movement under the IMDG Code.

In accordance with the IMDG Code Amendment 31, paragraph 5.4.1.2.1 "A dangerous goods transport document may be in any form, provided it contains all of the information required by the provisions of this Code." It is not the intent of the IMDG Code to restrict the form of the required dangerous goods transport documentation. Therefore, the IMDG Code allows for the use of the "Shipper's Declaration for Dangerous Goods" form to the extent that the form meets all information requirements of the Code. However, this also does not prevent individual competent authorities or individual vessel carriers from applying more restrictive provisions, as they deem necessary.

I hope this answers your inquiry.

Sincerely,

Robert A. Richard  
International Standards Coordinator  
for Hazardous Materials Safety



040022



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
MILITARY SURFACE DEPLOYMENT AND DISTRIBUTION COMMAND  
OPERATIONS CENTER  
661 SHEPPARD PLACE  
FORT EUSTIS, VA 23604-1644

Safety Branch

January 28, 2004

Mr. Duane Pfund  
Office of Hazardous Materials Transportation  
Research and Special Programs Administration  
U.S. Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590

## **URGENT PLEASE EXPEDITE**

### **Request for Formal Letter of Interpretation**

**Re: International Maritime Organization (IMO)**  
**International Maritime Dangerous Goods Code (IMDGC)**  
**Chapter 5.4.**

Dear Sir:

On behalf of the United States Department of Defense (DOD), we are requesting your office issue a Formal Letter of Interpretation related to our reference above. The following file number has been assigned:

**File Number: 28-04 (0128)**  
**Re: USTC Letter 22 APR 2003**  
**Proponent: US DOD**

We are petitioning you to assist us by providing guidance for our customers engaged in international commerce shipping hazardous materials within the purview of International Maritime Organization's body of codified standards. Essentially, our request focuses upon clarification of the IMO position relative to the documentation requirements for multimodal movement of HAZMAT as stated in Chapter 5.4, paragraph 5.4.1.3.3 of the IMDGC.

"When an existing transport or shipping document, or cargo handling form, cannot be used for the purposes of dangerous goods documentation for multimodal transport, these specimen declaration forms (5.4.5) may be used."

This request is submitted by Mr. Joseph P. Dugan, phone 757 878-8294, e/mail [duganj@sddc.army.mil](mailto:duganj@sddc.army.mil), Directorate of Plans, Readiness and Mobilization, Safety Team, Military Surface Deployment and Distribution Command, Operations Center, 661 Sheppard Place, Fort Eustis, VA 23604-1644.

Sincerely,



Mark P. Wyrosdick  
Major, US Air Force  
Chief of Safety



UNITED STATES TRANSPORTATION COMMAND

508 SCOTT DR  
SCOTT AIR FORCE BASE, ILLINOIS 62225-5357

22 APR 2003

MEMORANDUM FOR HQ MTMC/MTDC-OP  
ATTENTION: Mr. C.E. Radford

FROM: TCJS-SD

SUBJECT: Request for Official International Maritime Organization (IMO) Clarification

Request your office, as the DOD proponent for the handling and movement of hazardous materials (HAZMAT), obtain official memorandum from Department of Transportation clarifying the IMO position on documentation requirements for multimodal movement of HAZMAT as stated in Chapter 5.4., paragraph 5.4.1.3.3 of the International Maritime Dangerous Goods Code. Reference 26 February 2003, 11:08 A.M. e-mail from Mr. Duane Pfund, DOT International Standards Coordinator (attached). Reference e-mail has been stated as official guidance but an official memorandum is requested to further support the execution of shipping hazardous shipments prepared for shipment by air diverted to surface, i.e. vessel, for onward movement to final destination.

GEORGE R. RANEY  
Chief, Strategic Distribution Branch  
Strategic Initiatives Division

Attachment  
19 - 26 February e-mail string

cc:  
USEUCOM J4PM