



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

MAY 12 2005

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

Mr. Richard V. Soderberg
Technical Manager
Fibre Box Association
2858 Golf Road
Rolling Meadows, IL 60008

Ref. No. 05-0064

Dear Mr. Soderberg:

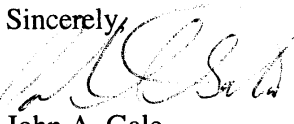
This is in response to your March 18, 2005, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-185). Specifically, you request clarification on the training requirements for the corrugated container manufacturing industry.

Your understanding is accurate, as the manufacturer of packagings used to transport hazardous materials in commerce, your hazmat employee training must include the provisions outlined in § 172.704(a)(1), (a)(2), and (a)(4). Your hazmat employee training is not required to include the provisions in § 172.704(a)(3), in accordance with § 172.704(e), or those provisions contained in § 172.704(a)(5), subject to applicability of security plan requirements under Part 172, Subpart I. The required training may be provided by company training programs, consultative services (e.g., training firms, colleges and universities, or Federal or State agencies), or through the completion of self-guided training.

The Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Hazardous Materials Initiatives and Training offers at no charge a Security Awareness Training Module as an interactive CD-ROM designed to help hazmat employers comply with the security awareness training provisions in § 172.704(a)(4). The CD-ROM and many other training materials may be ordered by contacting the Office of Hazardous Materials Initiatives and Training at 202-366-4900 or by accessing PHMSA's Web site at the following URL: <http://hazmat.dot.gov/>

I hope this satisfies your request.

Sincerely,


John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



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172.704



BAH
§ 172.704
Training
05-0064

Fibre Box Association

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March 18, 2005

Mr. Edward Mazullo
Director, Office of Hazardous Materials
400 7th St., S.W., Room (OITM10)
Washington, D.C. 20590

Mr. Mazullo:

This is an inquiry for clarification of Haz Mat "Training Requirements" for the corrugated container manufacturing industry. Specific paragraphs for reference are 49CFR 172.704, item (a), parts (1) to (5)

As we interpret this section, manufacturers of corrugated boxes must fulfill the requirements of parts (1) and (2), but are not required to fulfill parts (3) and (5). Is that accurate?

The question then is this: "Are manufacturers of corrugated boxes required to comply with part (4), "Security Awareness Training"?"

If your interpretation is that part (4) is required for corrugated box manufacturers, what kind of training is required, and where can the training materials be obtained?

Thanks for your assistance in clarifying this matter.

Very truly yours,

Richard V. Soderberg
Technical Manager, Fibre Box Association

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