



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

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

JUN 6 2006

Mr. James R. 'Hank' Ellis  
Director, Civil Engineer  
Computer Sciences Corporation  
Vance Infrastructure Support  
140 Channel Street, Suite 201  
Vance AFB OK 73705-5621

Ref. No. 06-0110

Dear Mr. Ellis:

This responds to your April 21, 2006 letter requesting clarification on the applicability of the training requirements in Part 172 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to your hazardous waste generator certification signatory. Specifically, you ask if the training requirements apply to an individual who signs the shipper's certification required under § 172.204(a).

The answer is yes. The training requirements apply to hazardous materials employees who perform functions that are subject to the requirements of the HMR (§ 172.702(b)); this includes the employee who signs the shipping paper certification.

I hope this answers your inquiry.

Sincerely,

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



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172.204(a)

Computer Sciences Corporation  
Vance Infrastructure Support

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§172.205  
Shipping Papers  
06-0110

April 21, 2006

Edward Mazzulla  
U.S. Department of Transportation  
Pipeline and Hazardous materials Safety Administration  
Office of Hazardous Materials Safety  
400 7 th Street  
Southwest Washington, D.C. 20590

Dear Mr. Mazzulla:



I am requesting an applicability determination for the manifesting requirements of 49 CFR for our situation here at Vance AFB.

Our hazardous waste disposal is contracted through a Defense Reutilization and Marketing Office contract via an external transporter. We do not utilize any DOT transportation on Vance AFB, nor do we ever move HAZMAT on public roads.

In our situation, do the manifest training rules of 49 CFR, Part 172 apply to the generator certification signatory? More specifically, our certified hazardous waste manager hand carries the manifest to the signature authority, and the transporter who prepares the manifest for generator certification is fully DOT trained.

Your quick response is greatly appreciated. If you have any questions, please contact Mr. Shannon Elledge at (580) 213-6226.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Hank Ellis', is written over the typed name.

James R. 'Hank' Ellis  
Director, Civil Engineer

JE/pt

cc: File

140 Channel Street, Suite 201  
Vance AFB OK 73705-5621  
(580) 213-7771