



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

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

MAR 24 1999

Mr. Michael D. Alston
Logistics Specialist - Hazardous Materials
Aristech Chemical Corporation
600 Grant Street, Room 1020
Pittsburgh, PA 15219

Ref. No. 98-0338

Dear Mr. Alston:

This is in response to your letter dated November 3, 1998 regarding §§ 172.704 and 172.204(d) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you wish to verify that the training requirements apply to an individual who signs the shipper's certification required under § 172.204(a).

Your understanding is correct. The training requirements apply to hazmat 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 satisfies your request.

Sincerely,

John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards

172.704
172.204

ARISTECH

Aristech Chemical Corporation
600 Grant Street
Pittsburgh, PA 15219-2704
412/433-2747

PAH
§ 172.704
98-0338

November 3, 1998

Associate Administrator for Hazardous Materials Safety
Attention: Standards, DHM-10
Research and Special Programs Administration
U.S. Department of Transportation
400 7th Street, SW
Washington, DC 20590-0001

Dear Sir(s),

I am writing this letter to request an interpretation of a regulation contained in CFR Title 49-Hazardous Materials Regulations.

The section 172.204 d Shipper's Certification – Signature: states that the certifications required by paragraphs (a) and (c) of this section:

(1) Must be legibly signed by a principal, officer, partner or employee of the shipper or his agent.

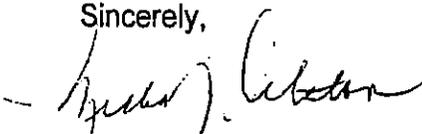
Do the persons stated in section 172.204 d (1) need to receive training in General Awareness, Function Specific and Safety training as required by 172.704?

Your response to this request would be appreciated. Recently, I was informed by a former Department of Transportation Inspector that the persons in question did not need training according to section 172.704, however, I firmly believe this to be incorrect.

You may respond to:

Aristech Chemical Corporation
Michael D. Alston
Logistics Specialist-Hazardous Materials
600 Grant Street, Room -1020
Pittsburgh, PA 15219
412-433-7948
412-433-7544 (Fax)

Sincerely,


Michael D. Alston
Logistics Specialist-Hazardous Materials

cc: P.C. Rine
E.H. Weber