



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

OCT 22 2014

Mr. Richard J. Walsh  
Managing Director  
Trident Safety Group, House Unit 5  
Westpoint Trade Centre  
Link Road, Ballincollig  
Co. Cork, Ireland

Ref. No. 14-0104

Dear Mr. Walsh:

This responds to your May 16, 2014, request for clarification on the training requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You request clarification on training requirements for United States (U.S.) companies shipping from Ireland into the U.S. by vessel and aircraft that already have completed International Civil Aviation Organization (ICAO) Technical Instructions and International Maritime Dangerous Goods (IMDG) Code training. Specifically, you request clarification on whether HMR training is required in addition to the ICAO and IMDG modal training.

HMR training requirements apply to persons who perform a covered function for hazardous materials transported in commerce to, from and within the U.S. The training must include general awareness, function-specific, safety, and security awareness training as specified in § 172.704(a) of the HMR. Training conducted to comply with the ICAO Technical Instructions or the IMDG Code may be used to satisfy the training requirements set forth in § 172.704 (see § 172.704(a)(2)(ii) and also § 171.22(g)(2)) to the extent that such training addresses the training components specified in § 172.704(a). Where this training does not satisfy the HMR, the employer or self-employed person must provide additional training to employees performing covered functions to comply with the HMR.

I hope this answers your inquiry. If you need additional assistance, please call this office at 202-366-8553.

Sincerely,

Dirk Der Kinderen  
Acting Chief, Standards Development Branch  
Standards and Rulemaking Division



Boothe  
\$172,700  
\$171,22  
Training  
14-0104

U.S. DOT  
PHMSA Office of Hazardous Materials Standards  
Attn: PHH-10  
East Building  
1200 New Jersey Avenue, SE.  
Washington, DC 20590-0001.

May 16<sup>th</sup>, 2014.

RE: - Hazmat Training for organisations shipping into US Territories.

Head Office  
Trident House  
Unit 5  
Westpoint Trade Centre  
Link Road  
Ballincollig  
Co. Cork  
Ireland

Telephone  
+353 21 487 9326

Facsimile  
+353 21 487 9327

Email  
sales@tridentsafety.com

Web  
www.tridentsafety.com

Dear Madam/Sir,

I am writing to your department to seek formal clarification in regards to the interpretation of training requirements for Hazmat employees offering goods for transport into US territories governed by Federal Regulation 49-CFR.

By way of introduction, our company is a training and consulting business operating in Ireland since 1990. We offer hazmat training and deep knowledge support to international companies operating in Ireland and Europe in the wider sense. We have recognised courses for Road, Sea and Air (ADR, IMDG, ICAO)

As part of our expansion in training we hoped to offer 49-CFR training in Ireland /EU and we had partnered with a US based well recognised training organisation to facilitate the training of delegates in Ireland as to the complexities of 49-CFR.

Our query relates to the training requirements of 49-CFR and State Variation USG-01 from the ICAO Technical Instructions Doc.9284/AN.905.

Many of our clients would have received ADR, ICAO and IMDG training previously.

We attempted to run a 49-CFR training course specifically aimed at US companies shipping from Ireland into the US via Sea and Air transport modes and the feedback we received was that; "49-CFR training is not required at any level as we have done ICAO and IMDG already."

So to frame our question; in light of the above, is 49-CFR training required additionally to the above modal training ?

I welcome your response to this query at your earliest convenience.

Yours sincerely,

Richard J. Walsh, Managing Director.