

Transportation/Hazardous Materials: Pipeline & Hazardous Materials Safety Administration Interpretive Letter Addressing Training Requirements



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The Pipeline and Hazardous Materials Safety Administration (“PHMSA”) addressed in a September 28th interpretive letter a request for clarification of the Hazardous Materials Regulations (“HMR”) applicable to training requirements. See Reference No. 23-0057.

PHMSA was responding to a June 6th email and phone conversation from WMG, Inc. (“WMG”).

WMG asked whether:

. . . training on the software used to generate hazardous materials shipping papers must be provided to a hazardous materials (hazmat) employee in accordance with the "Function-specific" training requirements specified in § 172.704(a)(2).

PHMSA states that the answer is yes.

Function-specific training is stated to be required for the function(s) for which a hazmat employee is responsible.

Consequently, PHMSA states that:

. . . if a hazmat employee must use a specific software to perform functions pertaining to the requirements of the HMR - such as classifying materials or generating hazardous materials shipping papers – the hazmat employee must be trained on that software.

A copy of the September 28th interpretive letter can be found [here](#).