



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

NOV 7 2006

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

Ms. Dorothea A. Welk
31600 – 126th St., S.E., #99
Auburn, WA 98092

Ref. No. 06-0237

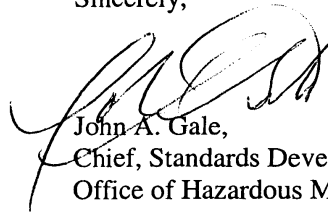
Dear Ms. Welk:

This is in response to your July 17, 2006 letter regarding training certification requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether an instructor or consultant must be “certified” under the HMR.

The answer is no. There are no provisions or procedures under the training requirements in Subpart H of Part 172 for review and approval of training programs or certification of instructors.

I hope this information is helpful.

Sincerely,



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



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171.12a
172.700

July 17, 2006

Foster
§ 171.12a
§ 172.700
Training
06-0237

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U.S. DEPT. OF JUSTICE
OFFICE OF CHIEF COUNSEL

2006 JUL 24 PM 2:52

PHMSA Chief Council
400 Seventh Street SW
Room 8417
Washington, DC 20590

Dear Chief Council,

I am questioning the certification of Dangerous Goods instructors and consultants.

I could not find anything in 49 CFR that dealt specifically with the qualifications of either of these positions.

I was informed that if the instructor or consultant does not perform any Dangerous Goods Functions such as creating a carrier bill or a Dangerous Goods Shipper's declaration, etc. that there is no requirement that they become 49 CFR, IATA, etc. certified in order to teach a DG class or consult on DG questions.

I would just like to confirm that this is correct.

Thank you,



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