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

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

January 29, 2004

Major Mark P. Wyrosdick
Chief of Safety
Department of the Army
Military Surface Deployment and Distribution Command Operations Center
661 Sheppard Place
Fort Eustis, VA 23604-1644

Ref. No. 04-0022

Dear Major Wyrosdick:

This is in response to your letter dated January 28, 2004 and subsequent conversations with Mr. Duane Pfund regarding the hazardous material documentation requirements of the IMDG Code for multi-modal shipments. Specifically you ask if the "Shipper's Declaration for Dangerous Goods" form utilized for the air mode of a shipment is authorized for onward movement under the IMDG Code.

In accordance with the IMDG Code Amendment 31, paragraph 5.4.1.2.1 "A dangerous goods transport document may be in any form, provided it contains all of the information required by the provisions of this Code." It is not the intent of the IMDG Code to restrict the form of the required dangerous goods transport documentation. Therefore, the IMDG Code allows for the use of the "Shipper's Declaration for Dangerous Goods" form to the extent that the form meets all information requirements of the Code. However, this also does not prevent individual competent authorities or individual vessel carriers from applying more restrictive provisions, as they deem necessary.

I hope this answers your inquiry.

Sincerely,

Robert A. Richard
International Standards Coordinator
for Hazardous Materials Safety

040022

DEPARTMENT OF THE ARMY
MILITARY SURFACE DEPLOYMENT AND DISTRIBUTION COMMAND
OPERATIONS CENTER
661 SHEPPARD PLACE
FORT EUSTIS, VA 23604-1644

REPLY TO
ATTENTION OF

Safety Branch

January 28, 2004

Mr. Duane Pfund
Office of Hazardous Materials Transportation
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

URGENT PLEASE EXPEDITE

Request for Formal Letter of Interpretation

Re: International Maritime Organization (IMO)
International Maritime Dangerous Goods Code (IMDGC)
Chapter 5.4.

Dear Sir:

On behalf of the United States Department of Defense (DOD), we are requesting your office issue a Formal Letter of Interpretation related to our reference above. The following file number has been assigned:

File Number: 28-04 (0128)
Re: USTC Letter 22 APR 2003
Proponent: US DOD

We are petitioning you to assist us by providing guidance for our customers engaged in international commerce shipping hazardous materials within the purview of International Maritime Organization's body of codified standards. Essentially, our request focuses upon clarification of the IMO position relative to the documentation requirements for multimodal movement of HAZMAT as stated in Chapter 5.4, paragraph 5.4.1.3.3 of the IMDGC.

"When an existing transport or shipping document, or cargo handling form, cannot be used for the purposes of dangerous goods documentation for multimodal transport, these specimen declaration forms (5.4.5) may be used."

This request is submitted by Mr. Joseph P. Dugan, phone 757 878-8294, e/mail duganj@sddc.army.mil, Directorate of Plans, Readiness and Mobilization, Safety Team, Military Surface Deployment and Distribution Command, Operations Center, 661 Sheppard Place, Fort Eustis, VA 23604-1644.

Sincerely,

Mark P. Wyrosdick

Mark P. Wyrosdick
Major, US Air Force
Chief of Safety

UNITED STATES TRANSPORTATION COMMAND
508 SCOTT DR
SCOTT AIR FORCE BASE, ILLINOIS 62225-5357

22 APR 2003

MEMORANDUM FOR HQ MTMC/MTDC-OP
ATTENTION: Mr. C.E. Radford

FROM: TCJ5-SD

SUBJECT: Request for Official International Maritime Organization (IMO) Clarification

Request your office, as the DOD proponent for the handling and movement of hazardous materials (HAZMAT), obtain official memorandum from Department of Transportation clarifying the IMO position on documentation requirements for multimodal movement of HAZMAT as stated in Chapter 5.4., paragraph 5.4.1.3.3 of the International Maritime Dangerous Goods Code. Reference 26 February 2003, 11:08 A.M. e-mail from Mr. Duane Pfund, DOT International Standards Coordinator (attached). Reference e-mail has been stated as official guidance but an official memorandum is requested to further support the execution of shipping hazardous shipments prepared for shipment by air diverted to surface, i.e. vessel, for onward movement to final destination.

GEORGE R. RANEY
Chief, Strategic Distribution Branch
Strategic Initiatives Division

Attachment
19 - 26 February e-mail string

cc:
USEUCOM J4PM

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