



U. S. Coast Guard Sector



Auxiliary Assistant Container Inspector

Performance Qualification Standard

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Sector Training Guide

Auxiliary Assistant Container Inspector Performance Qualification Standard

Qualification Code: AUX-EC

This booklet is one section of your personal on the job training (OJT) manual. It is your OJT guide to qualification as an Auxiliary Assistant Container Inspector. It is your responsibility to document completed unit training items.

Verifying Officers shall be experienced and qualified personnel who have demonstrated the ability to evaluate, instruct, and observe other personnel in the performance task criteria. Verifying Officers must be certified in the competencies for which they are to verify and must be Sector command designated. Verifying Officers must enter their title, name, and initials in the Record of Verifying Officers section before making entries in your workbook.

A Verifying Officer shall observe your successful performance of each task and document such with date and initials in the appropriate space provided in this booklet. It may be necessary to perform a task several times. The Verifying Officer will not give credit for any task that is not performed satisfactorily.

Auxiliarists do not have law enforcement authority. They cannot independently exercise COTP, OCMI, FMSC or FOSC authority and may become personally liable for actions they take outside of prescribed directives. Do not allow an Auxiliarist to be placed in a position that will compromise the limitations on the member's authority.

Auxiliarists are prohibited from opening containers and from entering confined spaces, such as containers or other void spaces. They are also prohibited from participating in Military explosive loadouts.

When you have completed all of the items required for this qualification, your COTP will issue a Letter of Designation. You must forward a copy of your Letter of Designation to your DIRAUX for entry into AUXDATA. Should any item be waived the qualification is considered local and will not be entered into AUXDATA and may not be used toward qualification for the M-Pro Pin.

This Performance Qualification Standard (PQS) was developed by the Auxiliary Prevention Directorate, thru the Office of Auxiliary and Boating Safety, Commandant (CG-BSX) and approved by Office of Port and Facility Compliance (CG-FAC). Questions or Comments shall be submitted to the Office of Auxiliary and Boating Safety, Commandant (CG-BSX-12), via the Prevention Directorate, thru the requesting members COLM.

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Auxiliary Assistant Container Inspector

RECORD OF COMPLETION		
Training Prerequisites	Date	Verifying Officer's Signature
A. Completion of resident training course: (Optional)		
1. Facilities Inspections Course		
B. Completion of correspondence courses:		
1. Introduction to Marine Safety and Environmental Protection (IMSEP)		
2. ICS 100		
3. ICS 200		
4. ICS 210		
5. IS 700		
6. IS 800		
C. Completion of PQS Workbook.		
D. Successful completion of unit level oral board.		
E. Designation Letter submitted for approval.		

Note: At a minimum, member must inspect at least four freight containers and two portable tanks.

All qualification requirements have been satisfactory completed by _____.

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Auxiliary Assistant Container Inspector

References

The following references will aid you in completing the tasks in this PQS.

- Department of Defense Military Handbook 138A "Container Inspection Handbook for Commercial and Military Intermodal Containers"
- Executive Order 10173: Regulations Relating to the Safeguarding of Vessels, Harbors, Ports, and Waterfront Facilities of the United States
- Federal Hazardous Materials Transportation Law (FHMTL) 49 U.S.C. 5101 et seq.
- Institute of International Container Lessors, Ltd. (IICL): "Repair Manual for Steel Containers"
- International Maritime Dangerous Goods (IMDG) Code 5.4
- International Maritime Organization (IMO) Convention for Safe Containers (CSC) Circular 134
- International Safe Container Act (ISCA) 46 U.S.C. 1503 et seq.
- International Standards Organization Handbook, "Freight Containers"
- Institute of International Container Lessors, Ltd. (IICL) Repair Guide
- Magnuson Act
- Memorandum of Understanding between U. S. Customs Service and U. S. Coast Guard
- Ports and Waterway Safety Act (PWSA) 33 U.S.C. 1221 et seq.
- Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)
- The Hazardous Material Transportation Authorization Act (HMTAA)
- The International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78, Annex III Convention
- Title 33 Code of Federal Regulations, Part 126
- Title 33 Code of Federal Regulations, Part 160
- Title 49 Code of Federal Regulations, Subtitle B, Chapter I
- Title 49 Code of Federal Regulations, Subtitle B, Chapter IV
- Title 49 U. S. Code § 1901 – 1909
- U.S. Coast Guard Chemical Hazards Response Information System (CHRIS), COMDTINST M16465.12C (series)
- U. S. Coast Guard Guidance and Procedures for Conducting Containerized Hazardous Material Inspections COMDTINST 16616.11(series)
- U. S. Coast Guard Marine Safety Manual, Volume I, Chapter 10, COMDTINST M16000.6 (series)
- U. S. Coast Guard Marine Safety Manual, Volume VI, Ports and Waterways Activities, COMDTINST M16000.11 (series)

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Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
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1.0 Coast Guard Authority and Jurisdiction

1.1 **Define** the Coast Guard jurisdictional scope for conducting container inspections under the following statutes and conventions:

- The Hazardous Materials Transportation Authorization Act (HMTAA) and its codified regulations
- International Safe Container Act and its codified regulations
- Ports and Waterway Safety Act as amended, and its codified waterfront facility regulations
- MARPOL 73/78, Annex III Convention and its codified regulations
- Executive order 10173 and its codified regulations

(*Note:* Member must be able to describe the range and limits for the above authority.)

1.2 **Define** the container inspection and search jurisdictional limitations for conducting the following:

- Consensual search of general cargo containers
- Search based upon reasonable suspicion
- Random inspection of general cargo containers

1.3 **Define** the consequences of an illegal search.

2.0 Industry Standards

2.1 **Define** how the 'person who offers or offeror' uses the following industry standards:

- International Standards Organization Handbook, "Freight Containers"
- 49 CFR 171-180, 450-453
- Institute of International Container Lessors, Ltd. (IICL): "Repair Manual for Steel Containers"
- IMO CSC circ. 134

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
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3.0 Responsibilities for the Transportation of Packaged Hazardous Materials

3.1 **Define** the following positions under the HMTAA and **define** their responsibilities:

- Person
- HAZMAT employer
- HAZMAT employee
- Terminal operator
- Person who offers or offeror
- Vessel carrier

3.2 **Define** the conditions under which International Maritime Dangerous Goods (IMDG) Code shipments may be offered or accepted for transportation within the U.S.

3.3 **Define** the exceptions that are authorized by 49 CFR 171.12 Subpart C (specifically – 49 CFR 171.22., 23 & 25)

4.0 Regulatory Differences in Shipment of Packaged Hazardous Materials via Rail, Water, and Highway Modes

4.1 **Define** modal differences in:

- Segregation
- Placarding exception for commodities less than 454kg/1001 lbs

4.2 **Define** what Marine Pollutant information is required for the different modes of transportation.

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
5.0	Hazardous Materials and Dangerous Goods Classification		
5.1	Demonstrate proficiency in the following: <ul style="list-style-type: none">• Identify definitions of each hazard class and division• Identify hazards associated with each hazard class and division.• Identify forbidden materials and packages• Define primary and subsidiary hazards	_____	_____
5.2	Define what Marine Pollutant information is required for the different modes of transportation	_____	_____
5.3	When assisting in the investigation of an incident: Demonstrate the ability to verify requirements for training, certification and recordkeeping per 49 CFR Subpart H and 40 CFR 171.22(g).	_____	_____
6.0	Hazardous Material Table and Dangerous Goods List		
6.1	Demonstrate proficiency in the application and understanding of the following areas of 49 CFR: <ul style="list-style-type: none">• Hazardous Material (HAZMAT) Table• Hazardous Substance Tables• Marine Pollutant List	_____	_____
6.2	Demonstrate proficiency in the application of the following areas of the IMDG List: <ul style="list-style-type: none">• Dangerous Goods Lists• Index	_____	_____

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
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7.0 Documentation Requirements

7.1 **Define** the following shipping papers requirements utilizing 49 CFR 171-180:

- Shipping paper general entries

(*Note*: Member must be able to correctly describe the general information required to be on shipping papers. For example, continuation pages, legibility, and distinction of general goods from dangerous cargo)

- Proper basic description of hazardous materials
- Additional description requirements

(*Note*: Member must be able to correctly describe each additional description requirement found in 49 CFR 172.203.)

- Information listed on a Shipper's Certification
- The applicability and requirements of a Hazardous Waste Manifest
- Emergency response information requirements
- Information required on the Container Packing Certificate
- Retention and accessibility of Shipping Papers

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
7.2	<p>Define the following documentation requirements utilizing the IMDG Code:</p> <ul style="list-style-type: none"> • Dangerous Goods Transport document general entries <p><i>(Note: Member must be able to correctly describe the general information required to be on the Dangerous Goods Transport documents. For example, continuation pages, legibility, and distinction of general goods from dangerous cargo.)</i></p> <ul style="list-style-type: none"> • Proper dangerous good description and sequence • Additional requirements on the documentation <p><i>(Note: Member must be able to correctly describe all of the additional information found in IMDG 5.4.1.4.3 to 5.4.1.5.12.)</i></p> <ul style="list-style-type: none"> • Information listed on a Shipper's Certification • Emergency response information requirements • Information required on the Container Packing Certificate 	_____	_____
7.3	<p>Identify documentation differences between 49 CFR and IMDG Code.</p>	_____	_____
8.0	Marking Requirements		
8.1	<p>Define the following marking requirements utilizing 49 CFR 172:</p> <ul style="list-style-type: none"> • General marking requirements for non-bulk packaging • General marking requirements for bulk packaging • Prohibited marking • Authorized abbreviations 	_____	_____

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
8.2	Identify the requirements for the following cargoes and conditions: <ul style="list-style-type: none"> • Radioactive materials • Liquid hazardous material in non-bulk combination packages • Poisonous hazardous material • Limited quantity and Other Regulated Materials-Consumer Commodity (ORM-D) • Explosive hazardous material • Marine pollutants • Hazardous substances in non-bulk packages • Elevated temperature materials • Portable tanks or cargo tanks • Identification number prohibited display, special provisions and replacement 	_____	_____
8.3	Define the following marking requirements utilizing IMDG: <ul style="list-style-type: none"> • General markings of packages including IBC's • Radioactive materials • Marine Pollutants • Cargo Transport Units • Display of UN Numbers • Elevated Temperature materials • Limited Quantities and dangerous goods for personal or household use that are packaged and distributed in a form intended or suitable for sale through retail agencies. • Fumigated Units 	_____	_____
8.4	Identify differences in marking requirements between 49 CFR 172 Subpart D and the IMDG Code.	_____	_____

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
9.0	Labeling Requirements		
9.1	Define the following labeling requirements utilizing 49 CFR 172: <ul style="list-style-type: none">• General labeling requirements for transporting hazardous materials• Exceptions from labeling• Prohibited labeling• Additional labeling requirements• Radioactive materials• Mixed and consolidated packaging• Placement of labels• Exceptions for limited quantities or ORM-D	_____	_____
9.2	Define authorized label modifications authorized under 49 CFR 172.	_____	_____
9.3	Define the following labeling requirements utilizing IMDG: <ul style="list-style-type: none">• General labeling provisions for packages including IBC's• Radioactive material• Orientation label• Provisions for labels• Exceptions for limited quantities	_____	_____
9.4	Identify differences in labeling requirements between 49 CFR 172 Subpart E and the IMDG Code.	_____	_____
10.0	Placarding Requirements		
10.1	Define the following placarding requirements utilizing 49 CFR Subpart F: <ul style="list-style-type: none">• Applicability and exceptions• Prohibited placarding• Display of identification number on placards	_____	_____

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
10.1 (Cont.)	<ul style="list-style-type: none"> • General requirements <p><i>(Note: Member must demonstrate an understanding of tables, any additional exceptions, and placard modifications listed under 49 CFR 172.504.)</i></p> <ul style="list-style-type: none"> • Subsidiary hazards • Bulk packaging • General specifications for placards 	_____	_____
10.2	<p>Define the following placarding requirements utilizing IMDG:</p> <ul style="list-style-type: none"> • General Provisions • Radioactive materials 	_____	_____
10.3	<p>Define numbers/locations and visibility requirements of placarding utilizing both IMDG and 49 CFR.</p>	_____	_____
10.4	<p>Identify differences in placarding requirements between 49 CFR 172 Subpart F and the IMDG Code.</p>	_____	_____
11.0 Hazardous Materials Requirements			
11.1	<p>Define the following general packaging requirements:</p> <ul style="list-style-type: none"> • General exceptions <p><i>(Note: Member must be able to identify the requirements listed in 49 CFR 173.3 and IMDG 4.1)</i></p> <ul style="list-style-type: none"> • Exceptions for small quantities for 49 CFR • Exceptions for limited quantities for 49 CFR and IMDG • Consumer Commodity and personal exceptions for 49 CFR and IMDG 	_____	_____
11.2	<p>Define how DOT Special Permits are obtained and procedures for checking compliance.</p>	_____	_____
11.3	<p>Define competent authority and verify the designated national competent authorities.</p>	_____	_____

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
11.4	Define the following utilizing both 49 CFR and IMDG: <ul style="list-style-type: none"> • Requirements for bulk <i>and</i> non-bulk packaging • Requirements for authorized packages and overpacks • Packaging group assignments, and exceptions for hazardous materials • Correct packaging for bulk <i>and</i> non-bulk hazardous materials other than Class 7 • Requirements for preparation and packaging for Class 7 materials 	_____	_____
11.5	Identify differences in packaging requirements between 49 CFR and the IMDG Code.	_____	_____
11.6	Identify the process for contacting PHMSA to report suspected frequent package failures.	_____	_____
12.0	Container Structural Standards		
12.1	Identify container components and main structural members.	_____	_____
12.2	Identify structural standards for freight containers. <i>(Note: Member must be able to identify damage criteria for placing a container out of service using IMO CSC Circ. 134.)</i>	_____	_____
12.3	Identify structural serviceability requirements for containers containing Class 1 (explosive) materials.	_____	_____
12.4	Define the following container markings: <ul style="list-style-type: none"> • Container ID number • Gross weight • Tare weight • Racking test load • Stacking Test 	_____	_____

Auxiliary Assistant Container Inspector

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12.5	Identify the required information found on a CSC plate.	_____	_____
12.6	Define the differences between the Approved Continuous Examination Program (ACEP) and periodic examination programs.	_____	_____
13.0 Occupational Safety and Health			
13.1	Define the health hazards associated with container inspections.	_____	_____
13.2	Demonstrate proper utilization of hazardous material information, including the following sources: <ul style="list-style-type: none"> • Manufacturer's Material Safety Data Sheet • CHRIS Manual • DOT Emergency Response Guidebook • NIOSH guide 	_____	_____
13.3	Define the following hazards and first-aid treatment: <ul style="list-style-type: none"> • Oxygen deprivation • Toxic exposure through inhalation, ingestion, or dermal routes 	_____	_____
13.4	Identify the appropriate personal protection equipment (PPE).	_____	_____
13.5	Demonstrate proper use of atmospheric measuring devices and other meters used at the unit.	_____	_____
14.0 Container Inspection Skills			
14.1	Identify local Customs and Border Protection (CBP) representative(s) and define relationship between the CG and CBP regarding container inspections at the local level.	_____	_____

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
14.2	Define CBP's Automated Commercial System (ACS) program and how the Coast Guard utilizes it.	_____	_____
14.3	Identify containers for inspection using targeting criteria from COMDINST 16616.11 (series).	_____	_____
14.4	Evaluate hazards and apply safe work practices based on identification of hazardous materials/dangerous goods. (<i>Note:</i> Member must determine the hazards associated with the hazardous material(s) and determine the appropriate SWP's to be used prior to conducting the inspection.)	_____	_____

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
14.5	<p>Perform the following for an inspection of an intermodal freight container:</p> <ul style="list-style-type: none"> • Assist in Obtaining shipping papers and determine compliance with regulations. • Assist with Inspecting an intermodal freight container for structural integrity. • Determine if freight container meets the structural serviceability requirements transporting Class 1 Materials. • Check CSC Plate for compliance (i.e. weights, and ACEP) • Describe the proper safety procedures that must be followed when opening an intermodal freight container for inspection. • Verify packaged hazardous materials have been properly loaded and dunnaged. <p><i>(Note: Member must be able to identify critical errors in loading that may cause damage to packaging during transit IAW 49 CFR 176.69, 49 CFR 176.76 and IMDG Code 7.5.2.)</i></p> <ul style="list-style-type: none"> • Verify hazard communication requirements are met for shipments of bulk <i>and</i> non-bulk hazardous materials/dangerous goods. • Verify the labeling and placarding requirements (i.e. durability, visibility, numbering) utilizing both 49 CFR and IMDG. • Determine if proper packaging types are used and examine packages for damage. 	_____	_____
14.5 (Cont.)	<ul style="list-style-type: none"> • Verify shipping documents describe contents of the intermodal freight container. • Verify stowage and segregation requirements within an intermodal freight container shipped by vessel. • Verify a container has been properly resealed upon completion of an inspection. 	_____	_____
14.6	<p>Define tailgate and devanning inspection searches.</p> <p><i>(Note: Member must be able to distinguish between the searches and identify actions to be taken.)</i></p>	_____	_____

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
14.7	Perform the following for an inspection of an intermodal tank container: <ul style="list-style-type: none">• Verify shipping papers.• Check tank markings and placarding for compliance.• Inspect the container frame for damage.• Inspect tank shell and cladding for damage and deterioration.• Check manhole covers and inspection ports.• Inspect valves and closures for operation.• Inspect data plate and determine if tank type is adequate for material.• Check test dates for compliance.• Compare data plate with special provisions and packaging codes for compliance.• Check CSC Plate for compliance (i.e. weights and ACEP)	_____	_____

15.0 Law Enforcement Actions

- 15.1 **Define** enforcement applicability and legal limitations of the following federal laws relating to hazardous material containers:
- 49 U.S.C. 5101 (FHMTL) and implementing regulations, 49 CFR 171-173, and 176
 - 46 USC 1503 (ISCA) and implementing regulations 49 CFR 450-453

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
15.1 (Cont.)	<ul style="list-style-type: none"> • 33 U.S.C. 1221 (PWSA) and implementing regulations, 33 CFR 126 and 160 • Executive Order 10173 and implementing regulations, 33 CFR 6 	_____	_____
15.2	Define the difference between a discrepancy and a violation.	_____	_____
15.3	Identify the following law enforcement options available and define their appropriate use to resolve HMTAA deficiencies: <ul style="list-style-type: none"> • Corrective actions • USCG operational controls • Civil Penalty Actions • Criminal violations • Applicability of COTP Letter of Warning 	_____	_____
15.4	Describe law enforcement options available for IMDG Code discrepancies for situations where: <ul style="list-style-type: none"> • Identical/similar federal regulations exist • No comparable federal regulations exist 	_____	_____
15.5	Identify appropriate actions for the re-inspection of a container. <i>(Note: Member must identify when a container requires a re-inspection under the continuous examination program or ACEP program.)</i>	_____	_____
15.6	Describe the following operational controls: <ul style="list-style-type: none"> • Place a shipment on hold. • Detain a container. • Issue a COTP Order. 	_____	_____
15.7	Describe procedures necessary to formally notify shipper/carrier of a discrepancy and implement corrective actions/operational controls.	_____	_____

Auxiliary Assistant Container Inspector

<u>Task Number</u>	<u>AUX-EC Task</u>	<u>Date Completed</u>	<u>Verifying Officer's Initials</u>
15.8	<p>Describe the elements that must be proven to constitute a civil penalty violation for each of the following:</p> <ul style="list-style-type: none"> • 49 U.S.C. 5101 (FHMTL) and implementing regulations, 49 CFR 171-173, and 176 • 46 USC 1503 (ISCA) and implementing • 33 U.S.C. 1221 (PWSA) and implementing regulations, 33 CFR 126 and 160 	_____	_____
15.9	<p>Define the following terms and provide examples of criminal Violations of 49 U.S.C. 5101 (FHMTL) et seq. <i>(Note: Member must be able to use the SAFETEA-LU to determine the definitions of the terms, identify associated penalties and provide an example for each term under the FHMTL)</i></p> <ul style="list-style-type: none"> • Willful violation • Reckless violation 	_____	_____
16.0	<p>Marine Information for Safety and Law Enforcement (MISLE) Data Entry</p>		
16.1	<p>Demonstrate the ability to enter container inspection data into MISLE.</p>	_____	_____
16.2	<p>Demonstrate the ability to prepare a violation report in MISLE.</p>	_____	_____

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U.S. Department of
Homeland Security

United States
Coast Guard



SAMPLE LETTER OF DESIGNATION

Command's Name

Street Address
City, State Zip Code
Staff Symbol:
Phone:
Email:

1601
DATE

MEMORANDUM

From: I. M. Frank, CAPT
Unit's Name

Reply to
Attn of:

To: M. O. Ore, USCG Auxiliary

Subj: DESIGNATION AS AUXILIARY ASSISTANT CONTAINER INSPECTOR

Ref: Auxiliary Assistant Container Inspector Performance Qualification Standard Workbook

1. Congratulations! You have completed all requirements necessary to perform the duties of an Auxiliary Assistant Container Inspector. You are authorized to carry out the responsibilities of an Auxiliary Assistant Container Inspector within the scope of your qualifications. This is a significant milestone in your professional development and I commend your accomplishments.
2. This Letter of Designation should be retained as part of your personal Training Record and you will be assigned the Auxiliary Assistant Container Inspector's Qualification Code "AUX- EC".

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