



United States Department of Agriculture

Agricultural  
Marketing  
Service

Federal Grain Inspection  
Service

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TO: FGIS POLICY BULLETIN BOARD

FROM: Anthony Goodman, Director  
Field Management Division

SUBJECT: Inspection Completed Time on Stowage Exams of Railcars

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

## 1. PURPOSE

This memorandum provides guidance on documenting the recording of time of a prior-to-loading stowage examination of railcar(s) for grain movements.

## 2. BACKGROUND

Grain Inspection Handbook IV, Chapter 2 Work Records, Section 2.8 Stowage Examination Work Records states:

Official personnel shall maintain records for stowage examinations.

Stowage examination information may be recorded separately on any suitable form, sample ticket, or similar work record. Regardless of the type of form used, stowage examination records shall include:

- a. The type of examination; e.g., original, reinspection, or appeal.
- b. The carrier identification.
- c. The date and military time the examination was completed.

While this requirement is reasonable and unobtrusive for export stowage exams, it may be burdensome to record the time of certain stowage exams for movements of grain, particularly railcars in unit trains.

Most official personnel perform prior-to-loading stowage exams using one of two methods, either by checking strings of railcars in batches before loading or via camera systems positioned just prior to loading. Both methods result in the stowage exam being performed on the same day of loading, disregarding extraordinary circumstances. Over time, many official service providers have requested and been granted local exceptions to the requirement to record the time of examination based on the speed and timeliness of operations and other documentation procedures. Safety is the commonly cited reason for requesting an exception.

### **3. POLICY**

Effective immediately, when recording on a Work Record the results of stowage examinations for railcars inspected as batches, it is permissible to record the inspection completed time at which the last railcar in the batch was inspected as the inspection completed time for all of the railcars in the particular batch. The inspection completed time will be recorded in military time or 12-hour (a.m./p.m.) format.

A “batch” is defined as more than one railcar examined consecutively, in the same trip into the railyard, or past the camera.

The official service provider must maintain documentation (e.g., service requests, activity logs, other work records, etc.) to verify that the loading commenced within 24-hours after completion of the examination.

Note that the requirement to record the time still applies if an applicant requests a standalone stowage exam service for certification, regardless of the type of shipment.

### **4. FILING INSTRUCTIONS**

File a copy of this memo with the Grain Inspection Handbook IV until the handbook is revised to include this change. Field office managers must ensure that a copy of this memorandum is available to official agencies operating within their circuit.

### **5. QUESTIONS**

Direct any questions regarding this procedure to the local field office or to [AMS - FGIS Policies Procedures and Market Analysis Branch](#).