



United States
Department of
Agriculture

Grain Inspection,
Packers and Stockyards
Administration

Stop 3630
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Washington, DC 20250-3630

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Reference #218

TO: FGIS POLICY BULLETIN BOARD

FROM: John Giler, Director /s/ *John Giler*
Field Management Division

SUBJECT: "Average Quality" Unit Trains

ORIGINATING OFFICE: Policies and Procedures Branch

1. PURPOSE

This memorandum provides procedures for combining multiple railcar inspection results (individual grades or composite grades) for the purpose of issuing a single inspection certificate for the lot.

2. BACKGROUND

We have seen an increasing number of requests from railcar shippers for "average quality" certification of unit trains. The purpose of the request is to obtain a single certificate representing the entire unit train that may contain varying quality within the train. In the absence of any specific guidelines in our instructions or handbooks that are pertinent to "average quality" of unit trains, we are offering 2 separate options for shippers to obtain a single certificate representing an entire unit train.

3. INSPECTION PROCEDURES

For the purposes of this memo FGIS will consider that a single lot may represent an individual railcar or a composite sample up to 5 railcars.

Option (1) – Request "Combined Lot" inspection procedures. Under the provisions of section 800.85 "Inspection of grain in combined lots," of the United States Grain Standards Act (USGSA) regulations, grain that has been officially inspected and certified as two or more single lots may be recertified as a combined lot if (i) the grain in each lot was sampled in a reasonably continuous operation; (ii) the original inspection certificates for the single lots have been surrendered (if issued); (iii) representative file samples of the single lots are available; (iv) **the grain in the single lots is of one grade and quality**; (v)

official personnel who performed the inspection service for the individual determine that the samples used as a basis for the inspection of the grain in the single lots were representative at the time of sampling and have not changed condition; and (vi) the quality or condition of the grain meets uniformity requirements established by FGIS for official inspection of grain in combined lots.

In reference to unit trains, only railcars (single or composite grades) that are uniform in quality (same grade) and condition may be combined to form a combined lot.

Option (2) – Request inspection of the unit train under the CuSum loading plan with “average quality” factor criteria. When the load order grade specifies the lot inspection and certification is to be based on an “average” quality, inspection of the unit train will be on the basis of subplot inspections. When “average quality” is specified for a particular factor(s) it is the responsibility of the shipper to maintain the overall quality of the lot. If the overall average of the lot exceeds the specified average the applicant has the option of requesting a review inspection of the entire lot, or accepting Option 1 certification of the unit train.

Official personnel must set up the inspection log for “average quality” on the specified factors. Include information on the log that provides information which factor(s) are determined on the basis of “average quality.” Do not enter any starting values or breakpoints for the factor(s) that are “average quality.”

Material portions cannot occur on individual subplot factors that are declared “average” in quality. However, material portions may still occur for odor or condition, factors that have minimum/maximum, or absolute limits, or aflatoxin that exceeds FDA action limits.

Note: Section 13(a)(10) of the USGSA and section 800.86(b)(3) of the regulations require that the application for inspection and/or load order grade document reflect all the contract grade specifications.

4. QUESTIONS

Direct any questions regarding this policy to Robert Lijewski, Policies and Procedures Branch, at (202) 720-0224 or email at Robert.S.Lijewski@usda.gov