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United States Department of Agriculture

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TO: FGIS POLICY BULLETIN BOARD

FROM: Robert Lijewski, Director */s/Robert Lijewski*
Field Management Division

SUBJECT: Container Stowage Exams

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

1. PURPOSE

This memorandum establishes guidelines for determining whether a container meets/does not meet FGIS standards for fitness due to penetrating light. This memo also clarifies the difference between “direct” and “diffuse” light and addresses acceptable forms of floor repair.

2. BACKGROUND

Section 800.75(f)(2) of the regulations under the USGSA and FGIS instructions require stowage examinations of carriers when export and domestic grain shipments are officially sampled and inspected, or weighed, at the time of loading. In accordance with Directive 9180.48, Stowage Examination Services, a container stowage area must be considered clean, dry, free of infestation, rodents, toxic, substances, and foreign odor, and otherwise be suitable to store or carry bulk or sacked grain, rice, beans, peas, lentils, or processed commodities. The directive also provides instruction for examining the inside of the container for penetrating light to ensure that the container is free from small holes, cracks, separated floorboards, loose or missing fasteners, or other defects that could expose the product to damaging conditions.

Official personnel may encounter “aged” containers with penetrating light (similar to the light shining in around the vent) visible around a section of the doors, when the container is completely closed (possibly caused by a sprung or uneven door) even though the seals/gaskets appear to be intact.

Also, cracks or holes may be found in or around the perimeter of the wood floor resulting in questionable forms of floor repair being used.

This policy is established to alleviate uncertainty on what is acceptable when conducting container stowage exams.

3. DEFINITIONS

Diffuse Light – light that is spread over an area and not concentrated. It will appear scattered and dispersed or as a glow. The inspector will be unable to see through the door to the outside.



Direct Light – a greater part of the light goes directly from the source to the area lit. It will appear bright and focused. The inspector will be able to see outside of the container.



4. POLICY

a. Light

- (1) “Diffuse” light glowing in around a portion of the door of the container is acceptable as long as the door gaskets, panels, and hinges are intact.
- (2) “Direct” light shining in around a portion of the door is not acceptable.

Note: The inspector must view the light from every angle to determine what type of light it is. If the inspector can see outside the container at any point it is considered “Direct” light and the container will not pass the stowage exam requirements.

Note: Regardless if there is light penetrating, the container must have acceptable door gaskets, panels, and hinges. If not, the container will not pass the stowage exam requirements.

Note: This policy pertains exclusively to light penetrating through the doors. Any type of light coming from the roof, side panels (except vent), or floor must be repaired.

b. Floor Repair

The wood floors must be repaired with like material, however it has been determined that caulking can be used where the floor meets the side panel.

5. FILING INSTRUCTIONS

File a copy of this memo with Directive 9180.48, Stowage Examination Services, until the directive is revised to include this change. Field office managers must ensure that a copy of this memorandum is provided to official agencies operating within their circuit.

6. QUESTIONS

Direct any questions regarding this procedure to the local field office or to Robert Dorman (816) 659-8411, or email at Robert.J.Dorman@usda.gov of the Policies, Procedures, and Market Analysis Branch.