

DOES YOUR  
**HAZMAT TRAINING**  
MEASURE UP???

# TITLE 49 CFR

- Statute pertaining to the transportation of hazardous materials (hazmat) in the U.S.
- Requires the training of ALL HazMat employees.
- Increases a HazMat employee's safety awareness and reducing HazMat incidences.
- General                    173.1
- Specific                    172.704
  - Highway                177.800, 177.816

# Each HazMat Employer Must:

- Train and test,
- Certify; and
- Develop and retain records of current training (for three preceding years) for each hazmat employee (during the period of employment).

# HazMat Training Must Include:

- General awareness/familiarization;
- Function-specific
- Safety;
- Security awareness;
- In-depth security training, if a security plan is required
- Driver training (for those who operate a motor vehicle).

# Frequency of Training

- Initial training – a new employee, or an employee that changes job functions, may perform hazmat job duties before completing training, if:
  - The employee does so under the direct supervision of a properly trained HazMat employee; and
  - The HazMat training is completed within 90 days of employment or change in job function.
- Recurrent training is required every three years.

# Training records must include:

- Name
- Completion date of most recent training;
- Training materials (copy, description, or location);
- Name and address of HazMat trainer; and
- Certification that the hazmat employee has been trained and tested.

# HAZMAT Employee

- A person who is employed who directly affects hazmat transportation safety including:
  - A person who:
  - Loads, unloads, or handles hazmat;
  - Tests, reconditions, repairs modifies, marks or otherwise represents packaging as qualified for transportation of hazmat;
  - Prepares hazmat for transportation;
  - Is responsible for safety of transporting hazmat, or
  - Operates a vehicle to transport hazmat.

# What type of fines are involved?

- Violations of any hazmat regulations including training may be subject to a civil penalty of up to \$50,000 FOR EACH VIOLATION.
- If the violation results in death, serious illness or injury, the maximum civil penalty is up to \$100,000.
- Criminal violations may result in fines, imprisonment or both.



# Topics for Training

- hazardous materials identification and classification;
- hazard communication;  
[Shipping papers, markings, labels, and placards are used to communicate hazards of the materials to emergency responders, as well as, to those who handle hazardous materials routinely];
- packaging requirements; and operational rules.

# HAZARDOUS MATERIALS TABLE

- Proper shipping name
- Hazard Class
- Identification Numbers
- Packing Group
- Label Codes
- Special Provisions
- ERG Guide Number
- Placard Advisory

# Packing Groups

- The shipper is responsible for determining the appropriate packing group.
- Packing Group I                      PG I Great Danger
- Packing Group II                      PG II Medium Danger
- Packing Group III                      PG III Minor Danger

# Reconditioned Drums

## “as good as new”

- Physical inspection for residue, leaks, damage.
- The shipper must perform a leakproofness test. [49 CFR 173.28]
- One-time reuse exclusion:
- You get a one-time relief from leak-testing to ship your used material back out as a waste material; if the hazards of the material have not changed, you let it sit for 24 hours after filling, and then you transport it only by truck, using an appropriate carrier.

# Thank you

Michele Sakwa / 3RC

(704) 577-4337