

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

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