

1500 Hours of Training Required

by Jim Powell, Transportation Development Group

A few years ago, while I was in Oklahoma City conducting a training class, I stopped in to get my hair cut at a local salon. I was greeted by a cheerful young woman who proceeded to cut my hair, and as she did, we got to talking about her business.

Evidently, she rents the booth from the salon and works hard to pay back the money she borrowed so that she could attend cosmetology school. You see, the state of Oklahoma requires 1500 hours of training to become a licensed cosmetologist.

When she asked me what I was doing in Oklahoma, I explained that I was teaching a seminar; and after further questioning I explained that my business involved training people to ship "dangerous goods".

"Oh, you mean, like training people to put dangerous chemicals on airplanes?"

"Yes, something like that."

"Wow, that must require a lot of training. How long is your class?"

"Well, the industry standard is three days, but some of my competitors hold classes in as little as 4 hours. With me, not counting lunch and breaks, the course is about 18 hours..."

I don't think she believed me; and probably many outside our industry would be amazed as well. It takes nearly 100 times longer to become a "licensed" hairdresser in Oklahoma than it does to be "certified" to load deadly chemicals aboard a passenger aircraft.

What's wrong with this picture?

When I wrote this editorial for Air Cargo World, I predicted that the U.S. Government would have to step in and get in the business of reviewing and certifying dangerous goods training programs, at least for shipping by air. Well they haven't.

Under current regulations, the government is not involved in establishing, reviewing or certifying training programs for hazardous materials shipper, or forwarders, or truckers...

The employers are still responsible for establishing their own training programs under general DOT guidelines of "general awareness, safety, and function specific training", and in 2003 the DOT has added security training to the requirement. **So these employers who may know nothing about the hazmat regulations to begin with** are charged with the responsibility of coming up with the correct and comprehensive training solution for their hazmat employees.

A large number of well-meaning shippers and freight companies turn to outside companies to get help and send their employees to training seminars to be "certified", yet they would have no way



of knowing that there is no such thing as a certified school (as far as the U.S. government is concerned).

In the U.S., it is the *employer*, not the training company, who certifies their own employees.

So we end up with a Catch-22. If an employer sends an employee out to a seminar, it's still the employers who have to certify their employee's qualification in using the hazardous materials regulations, and determine if they are getting the right training from an outside source. If they don't know anything about the hazmat regulations to begin with, how are they supposed to do this?

One training company advertises completed multimodal training – air, ocean, highway in a single 6 hour class, yet other trainers require 2-3 days of training for a single mode of transport.

Without some degree of government oversight of the hazmat training process, how are companies – perhaps new to their businesses, going to assess whether their employees have been trained properly by an outside company.

Since the ValuJet disaster, where 110 passengers died because of an untrained shipper and an improper shipment of hazardous materials, dozens of companies popped up around the country offering "certification" and "DOT Approved" training. However, the hard truth is that there is no such thing as DOT approved training when it comes to training shippers and freight forwarders, and there are a lot of people who do not realize this.

In the US (and around the world), the broadest training standard that exists comes from the airline industry, through the **International Air Transport Association**. IATA certifies training schools, and provides for a two year recurrent training cycle (the DOT allows 3 years), and reviews and approves training programs for endorsed schools. This is a good start, however, there is no single standard for an IATA test, and furthermore this only addresses one mode of transport – Air. There's nothing even close to IATA (industry) standards in any other mode of transport.

Few people willingly call for government regulation – from an economic sense it may seem reasonable to leave hazmat training to the employers without any intercession from the DOT. But does it make sense when we're talking about safety and the realities of every day shipping?

Many would agree with the DOT that yes, **it is the employer who knows their operation best** and that they ought to be allowed to conduct training as they see fit as long as it complies with the law.

I agree, that employers should be allowed to do their own training without interference.

Yet I think those same people would agree that when an employer doesn't know the rules, when they don't understand hazmat – and they turn to an outside company as a resource to train them – that training company should have some type of certification or legal qualification to do so.



In the interest of protecting our society and its citizens, our government has deemed it necessary to certify doctors, we certify lawyers, school teachers, contractors, and yes – even hairdressers. But not hazmat instructors?

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