

The D.O.T. Training Rule

- What companies are affected?
 - Hazardous Materials Employers
 - Any company that manufactures, warehouses, distributes or transports a hazardous material becomes a "hazardous materials employer."
- Who must be trained?
 - Hazardous Materials Employees
 - A hazardous materials employee is any person who directly effects the safety of a hazardous material in transportation.



Getting the right type of training program

- What type of training is required
 - There are four categories of training
- General Awareness & Familiarization
- Safety Training
- Function Specific Training
- Hazmat Security Training
- Areas may overlap with training requirements for other government agencies (i.e. OSHA)





General Awareness Training

- Required for all hazmat employees; minimal level established by the D.O.T.
 - This type of training enables the hazardous materials employee to:
 - Recognize and identify hazardous materials shipments
 - Understand the numeric hazard class numbering system
 - Understand the hazards presented by the nine UN hazard classes and their subdivisions





Function Specific Training

- Handling
 - Storage and loading of hazardous materials
 - Cargo compatibility
- Placarding
 - Placarding requirements for trucks and freight containers
- Documentation
- Accident and Incident Reporting Requirements





Safety training

- Required for all employees who could contact hazardous materials shipments
 - Use of the Emergency Response Guidebook
 - Your company's procedures for dealing with an emergency
 - U.S. Government Emergency Response information required with the shipping papers
 - Emergency Response Phone Number
 - Emergency Response Written Information





Security training

- Required for all employees who otherwise require hazmat training and
- Required for all employees whose job relates to hazmat security
- Two training deadlines
 - If you are not required to file a written security plan, then training must be complete by the next recurrent training cycle
 - Otherwise, it must be done by December 22, 2003



How can you get hazmat training?

- D.O.T. says you, the employer are responsible
 - Option: Create your own training program (workbooks, tests, syllabus, etc)
 - Option: In-house training with outside consultant
 - Option: Send employees to outside seminar
 - Option: Self-study w/video or workbook program
 - CD-ROM or Internet Based Training
 - Option: Combination of all of the above



What about Computer Based Training?

- That's acceptable. DOT allows CBT
 - We have several CBT programs
 - Hazmat Security Training (Free)
 - DOT/49 CFR Training
 - IATA Initial Acceptance and Recurrent Training
 - DOT General Awareness Training (coming soon)
 - We currently have a beta-version of the DOT general awareness if you'd like to participate





Record Keeping requirements

- Type of training documentation
 - Copy of the materials used, including the test
 - Name and address of the instructor
 - Date, location, and duration of training class
- Warning to shippers and forwarders!
 - A certificate is nice for framing but your training company should give you a copy of the corrected test for your files!!! Many don't do this.





Record Keeping requirements

- How long do you have to keep this documentation?
 - As long as the employee works for your company.
 - You need to keep only the last two years of records.
 - After employee leaves, you are only required to keep his records for 90 days.



A little known secret about tests...

- Hazmat test must be reviewed with student!
 - To our knowledge, TDG is one of the few IATA schools that actually sits down with the student after the test and reviews every single answer individually with them and gets a confirmation from them that they understand the correct answer.
 - We also follow up in writing with a copy of the test and a letter to the student explaining the important of understanding correct answers



A little known secret about tests...

- Why do we do that?
 - DOT doesn't require that you "pass" a test, only that you take a test.
 - This means that any score can be passing and any score can be failing as there is no set exam.
 - For example a truck driver takes a 20 question exam and get's 18 questions right – their score is 90%!
 - However, if the two questions they missed were on Placarding (an important driver function) the DOT would not consider their training as complete at a function specific level as they don't know how to perform an important hazmat employee function.

