US DOT Training Requirements – Quick Tips



Background

The U.S. Department of Transportation (DOT) has the authority to issue regulations governing the safe transportation of hazardous materials in intrastate, interstate and foreign commerce. This authority was granted in the Hazardous Materials Transportation Act, first adopted in 1974 and amended in November, 1990, as the Hazardous Materials Transportation Uniform Safety Act of 1990.

The DOT's Pipeline and Hazardous Materials Safety Administration (PHMSA) regulates the transport of hazardous materials through Title 49 of the Code of Federal Regulations (CFR), Subchapter C, "Hazardous Materials Regulations." Parts 171-180 provide general information on hazardous materials and regulations for their packaging and their shipment by rail, air, vessel and public highway. Each Part deals with a single subject and is then divided into subsections, as follows:

- **Part 171:** General information, regulations and definitions
- **Part 172:** Table of hazardous materials and special provisions, hazardous materials communications, emergency response information, training requirements, and security plans
- **Part 173:** Shippers general requirements for shipments and packaging
- **Part 174:** Transportation by rail
- **Part 175:** Transportation by aircraft
- **Part 176:** Transportation by vessel
- **Part 177:** Transportation by public highway
- **Part 178:** Specifications for packaging
- **Part 179:** Specifications for tank cars
- **Part 180:** Requirements for continuing qualification and maintenance of packaging

Training requirements for hazardous material (hazmat) employees are spelled out in Subpart H – 49 CFR 172.700 – 172.704.

Definitions

Training means a systematic program that ensures a hazmat employee:

- Is familiar with the general provisions of the hazardous materials regulations
- Is able to recognize and identify hazardous materials
- Has knowledge of specific requirements of the hazardous materials regulations applicable to the functions performed by the employee
- Has knowledge of emergency response information, self-protection measures and accident prevention methods and procedures

A hazmat employee is a person who is employed by a hazmat employer and who, in the course of employment, directly affects hazardous materials transportation safety.

A hazmat employer is a person (including a business or organization) that uses one or more of its employees in connection with:

- Transporting hazardous materials in commerce
- Causing hazardous materials to be transported or shipped in commerce
- Representing, reconditioning, marking, testing, certifying, repairing, selling, modifying or offering containers, drums or packaging to qualify them for use in the transportation of hazardous materials

General Training Requirements for Hazmat Employees (Subpart H – 49 CFR 172.704)

Each hazmat employee must receive initial and recurrent training that includes:

- General awareness/familiarization training
- Function-specific training
- Safety training
- Security awareness training
- In-depth security training
- Testing

General awareness/familiarization training is designed to provide familiarity with DOT regulations for shippers, transporters and manufacturers and to enable the employee to recognize and identify hazardous materials consistent with the hazard communication standards of the DOT regulations.

Function-specific training relates to the requirements of DOT regulations for shippers, transporters and manufacturers that are specifically applicable to the functions the employee performs.

Safety training must cover:

- Emergency response information required by Subpart G – 49 CFR 172.600 – 172.606
- Measures to protect the individual employee from the hazards associated with hazardous materials to which he or she may be exposed in the work place-specific measures the hazmat employer has implemented to protect employees from exposure must be included
- Methods and procedures for avoiding accidents, such as the proper procedures for handling packages containing hazardous materials

Security awareness training relates to security risks associated with the

transportation of hazardous materials and the methods designed to enhance transportation security. This training must also include a component covering how to recognize and respond to possible security threats.

Each hazmat employee who handles hazardous materials covered by their organization’s security plan and performs a regulated function related to the hazardous materials covered by the security plan, or is responsible for implementing the security plan must be trained concerning the security plan and its implementation. The in-depth security training must include company security objectives, organizational security structure, specific security procedures, specific security duties and responsibilities for each employee, and specific actions to be taken by each employee in the event of a security breach.

Each employer must test each of its hazmat employees by appropriate means.

Initial and Recurrent Training

A new hazmat employee or a hazmat employee who changes job functions must complete training requirements for the new job function(s) within 90 days. However, the employee may perform new hazardous materials job functions prior to the completion of training, provided the employee performs those functions under the supervision of a properly trained and knowledgeable hazmat employee.

Hazmat employees must receive the required training at least once every three years. For the in-depth security training required, a hazmat employee must be trained at least once every three years or, if the security plan for which training is required is revised during the three-year recurrent training cycle, within 90 days of implementation of the revised plan.

Training Records

Each hazmat employer must create and retain a record of current training for each hazmat employee. The record must include information for at least the last three years. This record must be retained for as long as that employee is employed as a hazmat employee and for 90 days thereafter.

The training records must include the following information:

- Hazmat employees name
- Most recent training completion date
- Description, copy or location of training materials used
- Name and address of the person providing the training
- Certification that the hazmat employee has been trained and tested as required.

Specialized Training for Drivers

49 CFR 177.816 regulations require that no carrier may transport, or cause to be transported, a hazardous material unless each hazmat employee who will operate a motor vehicle has been trained in the applicable requirements of 49 CFR Parts 383, 387, 390, 399 and the procedures necessary for the safe operation of that motor vehicle.

Commonly Asked Questions

Q: Can the hazard communication training required by the Occupational Safety and Health Administration (OSHA) be used to satisfy the U.S. DOT safety training requirements?

A: Yes, if the training addresses the DOT safety training elements, it may be used to satisfy the requirements.

Q: Who must provide the required training?

A: The hazmat employer or certain other public or private sources must provide the training. Two organizations that offer DOT training are DGI and Lion Technology Inc.

Q: What are some examples of employees requiring hazmat training?

A: Employees who:

- Determine if a material is a hazardous material
- Design, produce and/or sell packaging for hazardous materials
- Determine proper packaging for hazardous materials
- Put hazardous materials into packaging
- Mark and/or label hazardous materials packages
- Fill out shipping papers for hazardous materials
- Load or unload hazardous materials
- Operate vehicles that transport hazardous materials

Sources

Title 49 Subchapter C Hazardous Materials Regulations Parts 171 – 185

Title 49 Chapter III Federal Motor Carrier Safety Administration Parts 300 – 399

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