Hi, everyone. Thank you for joining. I see a lot of folks still joining into our meeting, so we’re going to give everyone just one minute to come on and join in, and then we’ll get started. Thanks again for attending this OneLab session. We’ll get started soon.

Hello everyone, and thank you so much for joining us today in this OneLab session. We are very, very excited to have a special guest here today to talk about training program requirements for shipping hazmat, such as Category A. So my name is Chelsea Parsons. I’m a consultant with Guidehouse, supporting CDC’s OneLab Initiative. And I just have a couple of notes about today’s webinar before we go ahead and get started.

If you’re having any technical issues throughout the session, any technical difficulties at all please, send an email to us at onelab@cdc.gov. We’ll have someone monitoring that inbox just to make sure we can help anyone with any issues. And that’s onelab@cdc.gov. If you have questions throughout the session for the presenter, we have a Q&A function opened up.

So you’ll see at the bottom of your screen in the little black ribbon, there’s a Q&A function. Please feel free to submit questions in there throughout the entirety of the session. We’ll be monitoring them, saving them up for our Q&A portion that we’ll have at the close of the session. If questions arise after the session, you can always email that inbox, too. It’s onelab@cdc.gov.

We’ll do our very best to try and answer as many questions as we can following the session. But in the case we don’t get to yours, we’ll take note of it and we’ll email you a response. All of the session materials will also be shared on our website following the session today, probably in about two weeks after this session.

So thanks again for joining. If you need live captions throughout the session today, you’ll see that there is a link in the chat coming up. That will give you live captions to today’s session. You’ll be able to follow along. One note is just to make sure that you have this Zoom session, as well as the caption link open. So let’s go ahead and get into our session agenda.

So today, we will just talk about a few OneLab resources. We’ll introduce our presenter for today’s session, and then we’ll get into the content. And then we’ll get into that Q&A section that I mentioned. So please feel free to submit questions at any time throughout the presentation. And we will finish by telling you about our next event in March. So I will go ahead and turn it over to our OneLab Network lead, Alicia Branch. All right, thanks, Alicia.

Thanks, Chelsea. Before we get started, I’d like to share the OneLab Rapid Education Capacity-Building Hub link that’s provided for you in the chat. And this is for new and returning participants. REACH is a targeted and customized learning management system for laboratory professionals.

You can consider REACH as a one stop shop for all relevant laboratory resources in various formats, including videos, downloadable and printable job aids, and courses for PACE credit, including a basic course related to today’s presentation, Packing and Shipping Dangerous Goods; What Laboratory Staff Must Know. Next slide, please.

I’m excited to introduce our presenter for today, Miss Elizabeth LaDow, a United States Navy veteran, serving in aircraft maintenance, and an experienced materials specialist with a history of working in the government administration industry.

Dr. LaDow is– well, I gave you a doctorate degree– is currently serving as the lead advisor and liaison for all of hazardous material outreach and engagement initiatives and activities for the Southern Regional Office of the United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration.

She serves the state of Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee, the Virgin Islands, and Puerto Rico. In addition, she works closely with multiple federal, state, and local officials to ensure the safe transportation of hazardous materials and other energy products. Next slide, please.

Please note that the slides may contain presentation material from panelists not affiliated with CDC. In addition, the presentation content from external panelists may not necessarily reflect CDC’s official position on the topics covered. Today’s presenter, Miss Elizabeth LaDow.

 Thanks, Chelsea. And thanks, Alicia, for the nice introduction. And isn’t it a mouth full of words you had to say about where I work and who I work for? So today, we are going to be talking about training program requirements. And I am working right now to share my screen with you, everybody. Let’s see. Alicia or– can you guys let me know, make sure that my slide deck is showing?

Looks good.

Perfect, thanks. Hey, just to let you guys know real quick, I traveled in late last night and I have some sciatica going on. So I’m going to be moving a lot, and I hope it’s not too distracting. All right, so anyway, good morning. My name is Liz LaDow, and I do work for the US Department of Transportation’s Pipeline and Hazardous Materials Safety Administration.

Today’s topic essentially is going to focus on using the hazardous material regulations to guide you in the safe shipping practices, and hopefully develop a kind of stronger grasp, or a stronger presence in your employee hazmat training program that will relate to your employer– or maybe you are the employer who’s shipping hazardous materials, such as Ebola, which is classified as Category A hazardous material.

I probably should apologize, but I’m not. This is a shameless plug right here for our electronic newsletter that PHMSA puts out quarterly. If you’re interested and would like to sign up for our newsletter, you can use the QR code. Pull out your phone and turn the camera on, and that should take you to the link, if you’re interested in receiving our newsletter, which would give any regulatory updates or changes that we have, or training or webinars that are going on that you may find interesting. Shameless plug, sorry.

All right so, 49 CFR– what is it? Well, on the most basic level, the 49 CFR is the Code of Federal Regulations or laws. Parts 100 through 180 specifically to describe the regulations or laws that relate to shipping hazardous materials. For some of you today, this might be really basic. However, I think with our mixed audience, I thought this would be a good place for us to start.

The regulation itself, if you have your own copy, you’ll know it’s about two inches thick. Just to keep it real, that’s my copy that I currently have, the most recent edition that I have here in my office at the house. We’re not going to cover everything in that thick regulation.

We’re going to stick to the sections that speak to safe transportation of infectious substances, focusing, again, on the employee training requirements that will help you not only maintain compliance with the law, but also keep everyone really involved in the transportation of those materials safe.

So here are two learning aids I wanted to share with you. The item here on the left is a QR code link to the 49 CFR– basically, an electronic version, or ECFR, if you will. If you’re interested in it and you want to follow along and see where I’m at, you can use that QR code here on the left. The QR code on the right that you see is for our publication on transporting infectious substances safely.

Feel free to access them, save them, share them– whatever you find that’s most helpful. I will let you know where we are in the regulations as I go through the content. So if you have a book or you use the app, you can pull it up. Also I wanted to let you know to keep in mind that any time during this presentation I say “49 CFR,” or I say “the hazardous material regulations,” or the “HMR,” I kind of use them interchangeably.

Essentially for today’s purpose, learning opportunity, they mean the same thing. So I don’t mean to be confusing. Sometimes that’s just how it comes out– 49 CFR, hazardous material regulations, or just HMR. So again, here on the right is that publication that I think you will find the most useful on transporting infectious substances. Again, feel free to take a snap of that, share it, however you want to use it.

So I’ll have a couple more resources as we go through this session. We’ll access them similarly. These take you straight to our website. Rather than having people trying to type things down, I thought you might find this a little more useful. All right, so the publication here on the left, it’s a great, quick resource if you don’t have a full copy of the 49 CFR available.

In this guide, you’re going to find details on training regulations, as well as definitions of terminology. You’re going to find definitions like– and we’re going to talk about them– the hazmat employer, and hazmat employee. You’ll also find answers to the most frequently asked questions, or FAQs, complying with these regulations. Obviously, can help you transport hazmat more safely, and avoid unnecessarily penalties, in the event you’re involved in an inspection.

The QR codes, again, in the upper right hand corner, you can just use with your cell phone. So the publication on the right that you see is our guide to developing a hazmat training program. If there’s anybody out there that’s really just starting to set up your program, you’re not sure how to, there’s some good examples in here. Feel free to use them. They’re not copyrighted.

You can share them, make them your own, name, or whatever. We just want you to have a method or mechanism in place, something to use as samples if you’re having to create something from scratch. So why is this such an important topic? Well, without proper training, hazmat employees would not be able to properly use the regulations which prepares the hazmat to be transported safely. That’s it, in a nutshell.

So a successful training program basically minimizes the risk of incident or accident as a result of human error, right? So the training requirements and the hazmat regulations, or the HMR, are designed so that shippers and carriers of hazmat feel comfortable and safe performing the functions required by their job.

So here you see a list, obviously of the factors that contribute to human errors in hazmat transportation. Recognizing when hazmat is present and when it’s entering the transportation stream is really a key factor. And just knowing that unique requirements apply, help to improve safety.

So if the critical importance to safety wasn’t already enough for you, PHMSA investigators have found more violations related to training than any other part of the hazardous material regulations. Here you see some of the most commonly found violations.

The message here basically that I’m hoping to send is that whether it’s time, money, or both, you’re going to save more in the end– for your well-being of your employees– if you focus on the bottom line, and that’s looking at safety and having good training programs. I think many people would say that learning to read and understand the 49 CFR, that two inch thick book I showed you– is really a lifelong endeavor.

It changes twice a year, there are updates to it. And I just want you to know, to kind of help with that, we’re just going over the basics today. And in no way do I mean for you to try to grasp it all. That’s not what this is about. I will touch lightly today on security plans. Just wanted to throw that little plug in there.

And also, this course is meant for those, again, who are just entering work environments where they’re dealing with hazmat, with regard to responsibilities related to training your employees. Again, basic course– not designed for those with intermediate or advanced knowledge of hazmat transportation regulations.

During this course, I hope that you’ll develop an understanding of the requirements that are in the HMR, related to training, and have a better understanding of who is required to be trained, and to be equipped with the tools to get the training done. So what does an effective program accomplish?

Well, first and foremost, it establishes a strong safety culture. At PHMSA, our goal is to help you create that, and provide you with the tools necessary to conduct your business safely. I, and I think everybody else that I work with, we all believe that having a strong safety culture is really a baseline to help you accomplish many things.

This includes increasing the safety for your employees, increasing the effectiveness– and not only your effectiveness, but also your in-house expertise in hazmat transportation. And hopefully, it results in a more productive environment, and more skilled personnel. A safety culture ultimately will raise the likelihood of safe and secure shipments that arrive at their destination without delay, incident, or being compromised by outside tampering.

They’ll reduce the likelihood of catastrophic events. A safety culture provides employees a sense of equity and safety compliance, if you will. It’s not just avoiding violations. It’s really avoiding catastrophe. So before we move on, I kind of want you to know the next few thoughts, they really have to do with definitions. And that’s what this reference is on the slide.

49 CFR 171.8 is where you will find all the definitions that are used consecutively or succinctly throughout the regulation. And it’s kind of important that you know what these are. So we’re going to get into them– just a couple, not all of them. The first term that we should all define before we get into the requirements is the “hazmat employer.” That’s with the “E-R” at the end– not the employee, the employer.

And it’s a person who employs or uses at least one hazmat employee on a full-time, part-time, or temporary basis who transports or causes the hazmat to be transported, or does all the things that you see basically listed on that third bullet. It could also mean someone who’s causing hazmat to be shipped, like a third party logistics company, or a broker, if they have involvement with the safe transportation of those materials.

Additionally, anybody who’s involved in the packaging intended for use to transport hazmat would be considered a hazmat employer– again, with the “E-R.” So guess what we’re talking about next? You guessed it, it’s the highest employee. And the hazmat employee essentially is anyone who is employed and having a job function that’s directly affecting hazmat transportation safety.

And some examples would be, if you’re filling out shipping papers, you’re a hazmat employee. If your only job is to sign the shipper certification on the shipping papers, you’re a hazmat employee. If you’re selecting the packaging for that hazmat that you plan to ship, you’re a hazmat employee.

If you’re loading or unloading, if you work for a package manufacturer or a requalifier, if you’re marking and labeling packages, if your only job is to fill that package, you’re a hazmat employee. It’s kind of a broad spectrum of possibilities. And it’s really up to the employer to make determination of who needs training. So I don’t know how many of you are employers, or you’re the training coordinator for your office, your agency.

It’s really important, though, to know how you’re defining and who are the hazmat employees. So our brochure, The Hazmat Transportation Training Requirements, that I referred to at the beginning of the presentation with the QR codes, it does provide some scenarios for making this determination.

It’s critical to remember, though, that if an employee has a responsibility related to the safe transportation of hazmat, again, they are a hazmat employee. And they have to be trained– not maybe, they must be. Another thing to remember is that a hazmat employer and a hazmat employee– ready for this? It can be the same person, in the instance where you have a one-man shop. So if you’re that person on this call today, you could be both.

All right, so now that we’ve established who the players are, let’s look at their responsibilities. These are found in 172.702 if you’re following along in the regulations. Many times, you’re also going to see that subpart h we see right here. And subpart h just refers to the section of the hazardous material regulations that’s specifically related to training. Again, that’s 172.702. So you can always go back and reference this later on.

So the responsibility of ensuring the training requirements in the HMR are met really rests on the hazmat employer. They have to make sure each of their employees receives the training. Any violations and subsequent penalties resulting back from lack of training, by the way, will not go to the employee. It goes to the employer. So it’s important to stay on top of that, not the employee.

So hazmat employers, “E-R,” also responsible for maintaining and keeping records of the training their employees receive. And we’ll talk about that here in a little bit. We’ll take a look at some examples. So an employee may actually lead the source of the training. And you don’t have to use an outside consultant trainer, or other services if you don’t want to.

I just have to caution you and say that the employer ultimately is responsible for making sure that whatever training that you have satisfies the regulations. So employees may do self-paced training. They can self certify that they’ve received the training. And again, I’ll give you some tools to conduct in-house training a little bit later on, if that’s an option that you choose.

So we have an understanding of who the hazmat employer is and employees are, as well as the responsibilities of the employer. So now it’s time– we’re going to discuss a little bit about what are the transportation requirements, right? So like I said in the beginning, we’re going to get into those blue learning aids. So if you have the PHMSA brochure, The Hazmat Transportation Training Requirements, or The Guide to Developing a Hazmat Training Program, this is where we’re going to get into those two publications and share.

So hazmat transportation training maybe a little different than other occupational training as you’re responsible for. The variety of hazardous materials and functions that employees perform really varies drastically. So the regulations reflect kind of your dynamic environment, if you will.

The HMR uses the phrase of a “systemic program” to describe training. This implies that the training program is not random or haphazard. Employers must use their expertise of materials they work with, and their business operations to tailor the training to make sure their employees have the tools they need to recognize when they are shipping hazardous materials, and be able to safely move them from origin to destination.

So there are no set hours, OK? No set hours required for training. Somebody– y’all may have heard about HAZWOPER training. And they have an eight hour course, and they have a 40 hour course. We don’t even tell you you have to have that. You don’t have to have HAZWOPER. That’s usually used for first responders. We don’t say you have to have eight hours or 48 hours.

What we do say is there are four main components of the hazmat transportation training that are required of all hazmat employees. And that’s what you see here, we’ve got general awareness familiarization, we’ve got function-specific training, safety, and security training. And there’s actually one more. But I don’t think it really applies to anybody here. And it’s called in-depth security training.

So I kind of left that one out. Nobody’s going to be– I don’t believe anybody’s shipping bulk infectious substances at this point. If you are, please contact me on the side, and I’ll help you with that. So the first, and maybe for some, the most overwhelming part of the training requirement, I think, is general awareness and familiarization training. It’s about teaching the employee awareness.

So awareness of the regulations that apply, the 49 CFR, parts 171 through 180, also known as the hazardous material regulations or HMR. I told you about that, interchangeable stuff. It has to do with awareness of how to recognize, identify hazmat through the HAZ communication that’s required by the regulations. Every hazmat employee has to receive this part of the training.

Hopefully, it’s not seeming– or maybe it does. Maybe it seems like a daunting task. But PHMSA and the USDOT, we have several resources available for free that are dedicated to helping you accomplish this. We want hazmat employees to be comfortable referencing the HMR, and be aware of general requirements to ship hazardous materials.

Maybe they need to meet specific packaging requirements, that there are shipping papers, marks and labels, and emergency response information that are applicable to the shipments. Also, the regulations may change, depending on how you’re choosing to ship, whether that is by ground or maybe even for air. So this, again, isn’t about mastering those regulations or memorizing anything.

It’s about being comfortable navigating through them or referencing them. It’s intentionally a broad requirement so that there is a baseline familiarity among all hazmat employees of the regulations that apply to what materials you’re shipping.

So the second component of training required by all hazmat employees is function-specific training. And I think this is the most challenging aspect for the employer to ensure they’re accomplishing. And the reason why I say that is the employees must– not may– they have to be trained on their functions that they have to perform, in accordance with the regulations.

Kind of put another way, if an employee’s job is to fill say, a gas cylinder, then they should have a strong command of the regulations about, or that apply to, filling cylinders. While the difficulty of the task may vary, the requirement to train employees on their job function does not.

So from the most advanced functions, like for me, packaging radioactive materials, to the simpler ones, like filling out shipping papers, employees have to make the determination on who does what, as it relates to the hazmat, and provide the training. So if you’re an employee, and your employee asks to take on a new role, you have to have, through your awareness and familiarization, some idea that, hey, the HMR– whatever my new job is, the HMR applies.

And gosh, I probably need to have training on this new function. Because I’m doing something new. And you would need to go to your employer and say, you know what, now since I’m doing a new job, I need to have some new function-specific training. And function-specific training oftentimes is most commonly done through on the job training, or OJT.

Trained employers or employees may supervise trainees on these tasks as they perform it. The DOT does offer a few resources on function-specific. But we really advise you, if you need more in-depth, you might want to seek out some– share some best practices from others in your industry, look to trade associations, or even consider a private training companies, if that’s something you think you may struggle with.

So in the next few slides, I’m going to use category A assignments for examples. All right, here we go. So filling and closing a package for transportation of category A materials is an example of a function-specific training. The employer could use this very example that I’m showing you here to train and test your employees on the requirements.

And of course, they would also need to use the specific closure instructions provided by the package manufacturer. This is typically found with your packaging purchase invoice, or in some cases, it may actually be imprinted on the packaging itself that you’re using. So to ship category A hazardous materials, you’re going to need a UN specification packaging that’s been tested to contain the materials that you’re going to be shipping.

So not only does the employee need to know how to select the correct packaging, but the employee would also need to know how to select and affix proper marks and labels that communicate the hazard to anyone who’s going to handle that package, whether it’s in your facility, or in the transportation system, or even when it’s being offloaded and delivered to wherever the destination is.

So the employer must also ensure that the employee who prepares the shipping paper does so correctly. So here, you see– just making sure– here you see a quick reference to what’s required. Feel free to snap a picture of this if you want and can’t wait till the slides come to you later. There are many different types of shipping paper, not gonna lie to you– many different ones, many.

So whatever the employer uses, that’s what they would need to use to conduct the training on the forms that they’re going to use at their operation, or that you’re going to use at your operation. So I want to point out, the employer would also have to determine if they’re required to use a technical name. And that’s going to be based on the material classification.

So 49 CFR 172.203, paragraph k, that we see referenced here on the third bullet, that’s going to speak more to this for the employer to explore before giving this function-specific training. So I tried to make the slide something very useful for you if you’re shipping cat A.

The third aspect of has hazmat transportation training that all employees must receive is safety training. So this training is on the inherent hazards that are presented in the materials that DOT regulates– how to safely handle them, the emergency response information that must accompany the hazmat at all times when it’s in the transportation system, additionally, the methods and procedures for what to do in the event of an incident– a leak, a spill, an accident.

DOT does not prescribe exactly what or how this training must be done, only that it must cover to satisfy the requirements. So while that may make it seem a little harder, we understand that many of these things are covered in other trainings that are mandated by other government regulations.

Therefore, if your training already satisfies the requirements of OSHA or EPA, you may use that training to satisfy DOT’s safety training requirement. Again, we don’t mandate an hour length to what safety training must be, only that it must cover those specific things.

So the fourth component of hazmat transportation training that each hazmat employee must receive is security awareness training. So security awareness training provides hazmat employees an awareness of security risks associated with that hazmat, and methods designed to enhance the transportation security. So this must also include the components covering how to recognize and respond to possible security threats.

And this is different than the in-depth security training I kind of touched on that I’ll talk on briefly here at the end. I hope that makes sense. All right, so testing. Testing hazmat employees must be done to complete training under the DOT regulations. The responsibility to ensure they are tested lies with the employer. Again, that’s the “E-R,” right?

But it doesn’t mean the employer must test them. So if a company is using an outside source to train their employees, they can be tested during that to satisfy the requirements of the regulations. The HMR doesn’t state how the hazmat employee needs to be tested, or what constitutes a passing grade. Again, this is the discretion of the employer.

We don’t even say a person has to pass the test. You’re happy, as the employer with their scoring, you feel it meets the requirements, and you’re comfortable putting things in transportation– nobody’s going to come back and say, we need to see a passing score, or, this one failed and it doesn’t count. We’re not going to do that.

However, again, your employees need to be able to demonstrate that they are knowledgeable on all parts of the required training– again, general awareness, function-specific, safety, and security, respectively. So whoever is responsible for carrying out the training program should consider what situation works best for each aspect of the training.

Maybe a written test is an easy way to confirm an employee understands the general awareness and familiarization. Function-specific, might be best to actually have them do something hands-on to show that they’ve done it. I don’t know what you do in your operation. But essentially, I think you would want to make sure that they can demonstrate that they’re capable of performing that task or particular function, if they’re given a new job, compared to what they were doing before.

Our safety training could be done with a verbal test in a group environment. There’s no requirement, again, around either. And if you find that one method suits your needs and you’re satisfied that the trainees are comprehending the required knowledge, I encourage you to use that method. So remember, employers– document, document, document. We’re about to discuss recordkeeping requirements. That was my little segue into that.

So you must keep records of all training, regardless of the method. And you have to document how the employees were trained and tested successfully. So earlier in the presentation, I mentioned training record violations were the top issue spotted by our investigators during compliance inspections. So keeping training records is vitally important to document that your employees understand the HMR, and are currently trained to perform functions covered by the regulations.

So here you’re going to see, basically on this slide, what’s required to be in an employee training record. Feel free to snap a picture if you like, or wait till the presentation comes out later. All right, so this is a sample training record from our brochure, Guide to Developing a Hazmat Training Program. You’ll notice that the record has the employee’s name at the top.

Well, and on my screen, I can’t use my thing. But anyway, you see it up there on the top. It’ll have the employee’s name. And it also has a certification by whoever is conducting the training. This could be the hazmat employer. It could be maybe a self-certifying that you’re trained, which, again, might seem strange. But you can do that.

And we want to make sure we allow the flexibility of that option. Just need to make sure, again, that it’s documented. If you’re using an outside source, just list the source. So the training record also includes description of the training that was provided, how they were tested, to include, if you want to, their score. But again, it’s not mandatory. The name and the address of the person providing the training, and the date of the completion.

We often get questions whether DOT issues training certificates. I think a few of you may be interested in that in this course today. So we don’t. We don’t certify training source. We don’t even require you to use outside sources. You’re the one, as the employer, who certifies that your employees have been trained. So we, again, would not issue a training certificate, unless you opted to use some of our free online training modules.

And you would get a certificate of completion for those. And those are self-paced, and I’ll talk to you about those here in a minute. All right, so good record keeping is a cornerstone of a strong safety culture. A hazmat employer has to maintain a record of current training and the preceding– ready for this?– three years. A hazmat employer must retain records as long as the employee is employed, and for 90 days thereafter.

The reason why the 90 days is in the event you still have materials that hadn’t shipped after the employee left, if there was an incident or something that required further analysis by my agency, we would want to see the training record. So that’s why 90 days after. The records can be digitalized, by the way. You can also scan them. You can place them in a storage facility, like a file cabinet.

But they have to be available, in the event we are conducting any kind of analysis or investigations, regarding the materials that you might have shipped, or where an employee was trained on materials that were shipped. So as the minimum, PHMSA requires hazmat employees to receive the required training, again, every three years.

The initial training requirement applies to hazmat employees who change job functions, as well as your new employee. The regulation allows the employee to perform the function prior to completion of the training, as long as they are doing so directly under someone who has already been properly trained to do that function.

So the training must be completed within 90 days after employment, or a change in job function. That whole “change in job function” seems to really mess people up. So maybe you have a person in your office that does shipping papers. And today, you need them to start packaging the materials. You got to train them on the packaging. Because now you’re doing function-specific training that perhaps they hadn’t done if they were doing the shipping papers.

Just, again, giving you an example of that– change in job function. So if you’re new to hazmat transportation, or newly responsible for training of hazmat employees, I hope this isn’t getting too overwhelming for you. You can always reach out to us. And we– well, not even us, just me. I’m happy to help you with this. I’m going to help you and mitigate risk as often as I can.

There are a few things I would like you to consider before you begin. You have to figure out who your hazmat employees are, based on the responsibilities. If someone has a responsibility to complete a function that’s found in the regulations, they’re a hazmat employee. I mentioned that there are a few scenarios that are outlined. Check that out in the hazmat transportation training requirements brochure.

But when in doubt, again, feel free to reach out to me, or anybody else here at my agency. Mark Nichols is also in our chat. And he, too, is a great resource for you. You should consider the needs of the company and the employees. Do you have a lot of employees that need training at once? Can they do it online? What’s your budget when you’re considering outside sources?

What kind of time can you devote to training? Do you have trained individuals who can supervise trainees while they’re completing the training, and if they’re doing that new function-specific task? These are all things that I think are very helpful to consider. We have, again, this brochure I mentioned over and over and over– shameless plug– Guide to Developing a Hazmat Training Program.

That should be considered essential reference materials for anyone that’s responsible for setting up a training program at your facility. So the regulations do not stipulate any trainer qualifications either, or certifications, in case that was a burning question in your head. The employer has the option of conducting the training or going to an outside source, public or private, as I mentioned before.

Nobody says you have to go pay for the training. Nobody says it has to be expensive. The regulations simply say you have to have the training. So we encourage you to, again, assess your needs very carefully before choosing your options. There are many resources out there. But again, be aware. We don’t endorse– PHMSA US Department of Transportation– does not endorse any training sources.

Also, the HMR allows an employer to accept new employees’ previous trainings if it’s relevant to the function that they’re going to be performing, and if a current training record is obtained from the previous employer. So if you hire somebody from another lab, and you can get their training record, you can count them as trained. And just be sure you want to three years off of the training day that you’ve received.

If they don’t give you the training records, then they’re a new employee. And you’ll have to set up new training for them. So again, while it’s not required by the regulations to provide your employees with their training records, we encourage you to be considerate and provide documentation if an employee asks for that. PHMSA provides, by the way, several excellent training resources. Ready? Here we go.

So one of our popular training resources is the Hazardous Material Transportation Training Modules. This is an online portal access that allows users to complete the general awareness familiarization and security training requirements. So two of the four required parts of your training definitely are free. Remember, you get what you get when you get free training. But it is free.

And it’s an online program. So you can take it at your own pace. If they can’t complete it, or they want to take a one hour chunk and just do one, and then come back and do another, we allow that. The system allows it. They will have to create a login to track their progress through the modules. They can come and go, again, as they please. The program will hold the spot for somebody who’s taking the training.

It is useful, I think, in creating training records, again, because we provide a certificate at the end of completion when they’ve gotten through the module. And the modules do include written tests. This program can be used as a basis for developing a function-specific training. But it really depends on what the function-specific job task is, and how much of this you can use.

So as an employer, I think you really are going to have to make sure that, again, your training provides and satisfies all the requirements from the regulations. So I highly, encourage you to explore this little low-cost option. It’s not required, but it is free. It’s a good place to start, if you’re responsible for setting up a training program for your hazmat employees, to figure out how involved the process is. Maybe go take it yourself.

And by the way, did I mention– again, shamelessly– it is free? I like giving people resources and tools and things that can use, kind of a gift. All right, so before I move into that security plan thing I told you about, I wanted to make a quick reference here that there are specific extra requirements for training, depending on what mode of transportation you plan to operate, with regard to shipping your hazardous materials.

Note that these are intended for carriers, or those that are responsible for loading vehicles or aircrafts or vessels. So it may not apply to many of you, and it may. I don’t know, sure. But they include things like blocking and bracing, driver training, vessel stowage, and other stuff that’s specifically related to those modes of transportation.

The PHMSA training modules do cover these topics in individual modules for each mode– in air, highway, and vessel. So the HMR doesn’t specify, again, any additional hazmat training requirements for rail. So if you’re shipping by rail, there’s no specific addition on that. All right, so just to recap. This what we’ve already discussed.

A good safety culture can help with a company’s ability to better ensure compliance with the regulations. We talked about the difference between a hazmat employer versus an employee. One has the “E-R” and one doesn’t, and the responsibilities associated with each. We touched on general awareness familiarization, function-specific, safety, and security awareness training.

We talked about record keeping and its importance. I showed you some possible training resources, and we talked about the modal-specific trainings that are required. And this is where if you have burning questions, please start throwing them over in the Q&A section. Because we’re getting to that point where I think you may actually have some questions. Or maybe I’ve done a really good job, and you don’t.

All right, so now that we’ve discussed hazmat transportation training requirements, it’s time to kind of move a little bit over here into this safety and security plans. What are they? Who needs them? And what training is involved? So these requirements are obviously found in the 49 CFR, sub-part I, at 172. If you’re following along, feel free to go there.

We put these two topics here because training and security plans together, they’re both considerations that have to be made by employers as you begin, or if you change your operations related to hazmat transportation. Also, there are further training requirements, if you will, that you’ll need to fulfill if your facility or your operation needs a hazmat security plan, which I don’t know. I can’t speak to what you may or may not need right now.

So what do we mean we’re talking about security requirements? Most importantly, there’s a security plan. It’s a written document that outlines securing hazardous material that you’re dealing with from outside threats. So not all hazardous material or operations require the security plan. So I’m just going to cover a little bit of which ones do.

So we’re talking about threat assessments also before you write your plan– components that the written plan has to address. And finally, we’ll talk about the training of employees on those security plans. So only shippers and carriers of certain types of hazmat or amounts are required to have a security plan.

So your first step as a hazmat employer is to really make an assessment, based on what you offer for transportation, in regards to hazmat, or what you plan to carry. There’s a new term here, which is only used in the context of security plans, and that is large bulk quantity. And I think this is where I told you, I don’t think this applies to anybody here.

But just in case, you’ve at least had exposure to it. Large bulk is different than regular bulk, as far as PHMSA’s regulation goes. It’s used throughout the hazardous material regulations. Again, I don’t think it applies to many. But large bulk quantities specifically refers to quantities in a single package that’s greater than the amounts here. You see of, what is it, 3,000 kilograms, or 6,614 pounds on solids. And then you see the same amounts for liquids.

If this doesn’t apply to you, and you have more questions– or if it does apply to you and you have more questions, I think I’d rather you reach out to me directly. Because I’m not sure how to answer, based on what the materials are that you’d be shipping. But at least we kind of glossed over it on what’s required.

So we covered a lot of the basics. But I hope I walk you through enough that you know more about these topics. In review, again, we discussed developing a good safety culture, and how comprehensive training and thoughtful security plans contribute to that. We talked about the roles and responsibilities when it comes to providing training, developing a security plan, and understanding everybody’s role in hazmat transportation.

We covered what parts of the training are required. I don’t see anything on my section, I was looking to see if we had anybody over in chat. We discussed testing and record keeping best practices, how those contribute not only to strong safety cultures, but also to keep you in compliance, when it comes to any inspections that might be conducted on behalf of my agency.

We talked about training sources. And I gave you some free resources to get you started developing a training program, to conduct training, and understanding a security plan. And then lastly, we talked a little teeny, tiny bit about hazardous materials that require a security plan.

If you don’t mind, please take a moment and use your phone to give me some feedback on this presentation that you’ve received today, how I can improve it. I can’t help it if you don’t like the color of my hair or how my office is arranged. But if there’s anything in the content you felt was missing, or could be enhanced for future offerings, I would love to have the feedback there.

I also want to share with you a couple of other resources. If you want to reach out, you have additional questions, this is our slide that we have for the Hazardous Information Center. It functions Monday through Friday, normal business hours. You can email, you can phone. There is somebody there that will get back to you if you do leave a message with regard to any questions that you have.

If you’d like to make it a little more personal, here is my email address, you see here on the slide. As well as my coworkers around the United States who perform the same job that I do, we’re here for you. If you live in California and you want to talk to Liz, you can talk to Liz. If you don’t like my voice and you’d rather talk to Shawn, call Shawn, or email Shawn.

And we’ll reach back out to you to help make sure you’re on the right track to try to make sure your training programs is meeting the needs of the hazardous material regulations. So Alicia, I think that’s it. I got us in with enough time for questions and answers. So what do you got going on?

OK. Thank you. OK, let’s get started. Of course, we have the question about certification. We have actually two questions.

OK.

And I think that you’ll just have to probably explain what the certification is, and who provides it.

Mm-hmm So certification– I think I probably droned on and on a little bit about that. But let’s go back to it. So PHMSA, we do not provide any sort of location for a trainer or an employee or a consultant to say that somebody certified the shift some way. The employer has the obligation to certify that they train their employees.

And they do they do that by their training record, documenting when they were trained, who did the training, and whether they were tested. So it’s not really a certification. Like, I’m not going to have a certification I can hang on the wall says that Liz LaDow can ship Eboli. I’m not going to have that from PHMSA.

My employer might say, she completed training X, Y, and Z. And I am certifying that she completed those trainings. That’s how the certification works in the regulation. The regulation requires the employer, the “E-R,” to certify that their employees are trained.

The follow-up with that one– so you’re saying that they should have the things that you outlined for the general awareness, the security, that should be part of that actual curriculum that they create, that they’re going to–

Those are requirements by the regulation that the employer must certify that they have received training on general awareness and familiarization. Let’s say that Liz LaDow took the class on general awareness for hazmat on Monday, February 27. And she was tested at the end of the course.

That’s what it’s going to say. And then it might say Liz LaDow completed OJT function-specific training on this date, signed off by this employee that she can perform the function. She was tested with a visual observation.

But again, it’s the employer that certifies the person.

Yes. Because ultimately, it’s the employer that’s responsible if there’s any incident while that material is moving in the transportation system. It always goes back to the employer. The employer is obligated to classify the hazardous material.

They’re obligated to make sure that it’s properly packaged, and that their employees have been properly trained to be aware of the materials themselves, know how to ship it, whatever their function-specific is, so that we don’t have catastrophic accidents or incidents.

So I hope that actually answered the question. Again, your employer is to certify you. And they will certify you, based on the things outlined in Liz’ presentation. And if you have any more questions, you can always reach out to us. And we can actually send you a list of those questions– I mean, those things that should be required. Or a copy of the actual manual. Or you can just go to the DOT website and actually pull the hazmat manual.

This one is a good one. Is IATA training in addition to DOT’s training? They said they have someone designated–

If you’re transporting your materials by air, you would fall under requirements– you potentially could, depending on what you’re shipping– you may have additional requirements that would fall under IATA. Similar to that with IMDG if you’re shipping on a vessel.

Let’s see what else we have here.

One of the viewers wanted to know if you could show the slide on what the inspectors find again.

Yeah, let me go back.

Number one, training, training records. Failure to train, one, two.

Yeah. And I know part of that may be because a lot of laboratories are experiencing a shortage. And you may only have one person in the laboratory that is actually trained. Do you have any suggestions on how they can probably expedite?

So I can tell you, I’ve seen training records done all kinds of different ways. The most unique one that I saw– and we accepted it– was written on a cocktail napkin. They had documented with– I guess they forgot to take paper, and that was what they could come up with. I guess they meant to write it up later, and didn’t.

They’re like, but we have this. And sure enough, I mean it was– you could tell it had been– it was several months old. It was not new. It listed everybody’s name who attended. They wrote the date on it, what was the training about– we accepted it. I mean, it’s not a whole lot of documentation.

If you have nothing else but a folder saying, you know, I went through and I did this. And we also said that a one-man shop, if you are the employer and the employee, you can self-certify. I reviewed the package closure instructions for packaging four cat A hazmat on this date. I double-checked myself after I closed the package, following those– however you need to document.

Put a paper in a folder, and you’ve got it. Just do something. Oftentimes we get out there, we find nothing– nothing. Something is better than nothing, even the cocktail napkin. Not that I want to see lots of cocktail napkins–

–but we have seen them.

Are select agents subject to subpart one security plan requirements?

That would get us into– I would have to have a little bit more information of how much and where it’s going, and all the other things that go along with that. I would rather that person reach out to me individually, if you don’t care on that answer.

OK. Let’s see. I think we answered that one. One of the participants wanted to know how closely are the DOT and IATA training requirements.

To be honest with you, I haven’t reviewed IATA– it’s probably been three or four years since I’ve gone into them. The employer would have to review that.

I can answer that. They are very– the things that are required are the exact same thing. The only addition is that IATA has included a competency exam into theirs. So they have included that. I think it should start this year. So you have to show that the employee is competent in whatever they’re shipping.

This participant wanted to know, what does failure to register with the hazmat mean– let’s see– is this the employer? So they wanted to know what does failure to register.

Well, if they were required by the regulation to register with PHMSA to ship whatever materials they are, if they didn’t register, potentially they could– a violation would be written if there was an incident and an investigator came.

I’m trying to see if we have any additional questions.

I think we’ve answered everything that I can see. Just want to do one kind of little check, if we’ve covered–

Can we go to the last slide? And then you’ll close out.

Yup, that’s actually where I was going.

Yeah, they want to get a picture of the.

I would like to say thank you again, Elizabeth, for presenting today. Right now, I would like to highlight our next OneLab event, which will occur on March 28 from 12:00 to 1:00 PM. And the title is, The Survey Process; What You Need to Know for Your CLIA Survey.

And this will actually guide participants through the preparation of a laboratory inspection. And the presenter is Ms. Miranda Scott. The registration link should be posted in the chat now. As a reminder, the slides for today will be posted at cdc.gov/onelab within the next two weeks. And again, I’d like to thank everyone for joining us, and have a great rest of your day.