

Daniels Training Services
815.821.1550
Info@DanielsTraining.com
www.DanielsTraining.com



Some common hazardous materials:

- Paints
- Resin
- Solvents
- Degreasers
- Concentrated cleaners
- Plating solutions
- Aerosols
- Acid/base

Ready for some more questions?

I have even more questions for your RCRA training provider! Be sure to check out: [8 Questions to ask your RCRA Training provider.](#)

Still have questions?



You can find more information on my website. Or, don't hesitate to

contact me if you have any questions about hazardous materials or the HazMat Employee training requirements of the US DOT.

11 Questions to ask your HazMat Employee training provider

Why 11 Questions?

The decision of who should provide triennial training to your HazMat Employees should not be taken lightly. You can do it yourself, of course. Or, you may opt to delegate it to an employee. Both of those are acceptable options if you have the time and resources to properly research the regulations, determine how they apply to your operations and then prepare the training based on the results of your research.

Another option is to hire a third person to conduct the training for you, and that's where I come in. I have been active in the business of transporting hazardous materials and providing HazMat Employee training for over twenty years. In that time

I've seen a lot of training and spoken to a lot of people who were disappointed in the training they received from others. I know it isn't easy to decide who among the training providers will work best for you.

I suggest you ask any prospective HazMat Employee training provider some or all of these 11 questions. Their response compared to mine will aid you in determining which trainer is right for you.



Good training makes a HazMat Employee happy!

1. Who are my HazMat Employees?

I have found that most employers have not identified all of their HazMat Employees to begin with and therefore fail to train adequately. A HazMat Employee is defined at 49 CFR 171.8, and includes *a person who in the course of employment directly affects hazardous materials*

transportation safety. It also includes anyone who loads, unloads or handles hazardous materials in transportation; reviews or signs HazMat shipping papers (including the hazardous waste manifest); designs, manufactures, or tests HazMat packaging; operates a

motor vehicle transporting HazMat; and more.

Also...

A HazMat Employee may be self-employed, full-time, part-time, or a temp.

Specific mention is made of railroad personnel as HazMat Employees.



The new Limited Quantity marking for shipments by air.

2. What are the regulations that require training of HazMat Employees?

The regulations pertaining to the training of HazMat Employees are found at 49 CFR 172, Subpart H.

This subpart specifies, among other things: training frequency, required content, records that must be kept, who must ensure adequacy of training, and more. Subpart H does not define a hazardous material, which

employers are HazMat Employers, and how to identify a HazMat Employee. For that you must refer to the definitions at §171.8.



“Triennial HazMat Employee training must include a test”

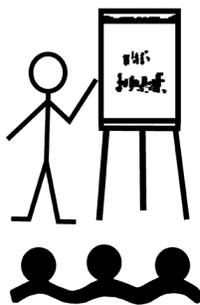
3. Does your HazMat Employee training include a test?

The answer should be ‘Yes’. 49 CFR 172.702 (d) requires HazMat Employees to be tested as a part of HazMat Employee training. The regulations don’t however, require a passing grade for the test or even indicate what would be considered acceptable. The purpose of the test is to demonstrate a trained HazMat Employee’s awareness

of the regulations in order to perform their duties safely. For this reason I use the test as a way to gauge a HazMat Employees retention of the training content and as a tool to expand my explanation of a topic if I feel it necessary. The goal is for your HazMat Employees to leave the training with the knowledge and the tools to perform their job in a

manner that protects them, their co-workers, and other HazMat Employees.

training



Be sure to select the best training for your employees

4. Is this training required by the US Department of Transportation (US DOT) or the Pipeline and Hazardous Materials Safety Administration (PHMSA)?

A trick question, the PHMSA is actually the administration within the US DOT that is responsible for the domestic transportation of hazardous materials (and all materials by pipeline). I’d give them a pass if they say US DOT, but **PHMSA is the better answer.**



5. Are you, or is your HazMat Employee training, certified by the DOT/PHMSA?

The correct answer is 'No'. Neither the PHMSA nor the US DOT “certifies” a training provider or training material.

Further, 49 CFR 172.702(a) specifically identifies the HazMat Employer as the person who must ensure their HazMat Employees are

trained adequately: *“A hazmat employer shall ensure that each of its hazmat employees is trained in accordance with the requirements prescribed in this subpart.”*

This places a heavy burden on you as the HazMat Employer to ensure your per-

sonnel are trained properly, no matter who performs the training.



The use of a placard with an orange panel containing the identification number marking.

6. Will you certify or ensure that my HazMat Employees are adequately trained and tested?

It is a little-known, but important, fact that 49 CFR 172.702(a): *“A hazmat employer shall ensure that each of its hazmat employees is trained in accordance with the requirements prescribed in this subpart.”* and §172.702(d): *“A hazmat employer shall ensure that each of its hazmat*

employees is tested by appropriate means on the training subjects covered in § 172.704.” both require the HazMat Employer (that’s you) to ensure their HazMat Employees are adequately trained and tested, not the training provider. The correct answer is,

“Yes, I provide the training and testing; you as the HazMat Employer ensure it is adequate.”

“It is the responsibility of the HazMat Employer to ensure their employees are properly trained and tested.”

7. How frequently is HazMat Employee training required?

An easy one. Initial training must be provided for new HazMat Employees (either recent hires or newly assigned job duties) **within 90 days** of employment, and they must be supervised by trained and knowledgeable personnel in that time. Full recurrent training—a review is not enough— must take place at

least **once every three years** (triennially) per 49 CFR 172.704(c).



I include the ERG and its use in my HazMat Employee training.

8. What recordkeeping is required for HazMat Employee training?

The correct answer to this question is very important since improper recording of training is one of the top violations issued to HazMat Employers. The HazMat Employee training record-keeping requirements can be found at 49 CFR 172.704 (d), and **must include:**

- The HazMat Employee’s name.
- The most recent training completion date.
- A description, copy, or location of the training materials.
- Name and address of the training provider.
- Certification of training and testing.

One of the services I provide with my training is to supply the documentation necessary for recordkeeping.



9. What subjects must HazMat Employee training include?

The requirements for HazMat Employee training content are documented at 49 CFR 172.704(a). **HazMat Employee training must include:**

- General Awareness/Familiarization
- Function Specific
- Safety & Emergency Response
- Security General Awareness
- In-Depth Security (if applicable).

“The transportation in commerce of any amount of a HazMat will require HazMat Employee training.”

10. What training is required for HazMat Employees who transport hazardous materials over a public roadway?

A person who transports any quantity of a hazardous material over a public roadway must receive HazMat Employee training as indicated in #9 above and must receive **driver training** per 49 CFR 177.816.

The maintenance of a Commercial Drivers License (CDL) with the HazMat endorsement may suffice in lieu of this training for some drivers.



HazMat Employee training for a driver of a motor vehicle is not determined by the amount of HazMat transported. Any amount is subject to the training requirements.

11. Are you a lawyer?

I have nothing against lawyers, in some situations their services are invaluable. However, they don't always make the best trainers because their experience has been interpreting the regulations and their legal justification instead of what you must do to comply with them. In contrast, my professional experience in the EH&S field has been

'on the shop floor': driving a truck, handling hazardous waste, completing weekly inspections, cooperating with agency inspections, preparing shipping papers, and more of the like. I feel my job as your trainer is to reveal the regulations and teach you methods of compliance I have learned over the years, not the Genesis

of the regulations. **At my training you'll learn how to do your job and comply with the regulations, not why you have to do it.**



HazMat placards on a parked vehicle.



“At my training you’ll learn how to do your job and comply with the regulations, not why you have to do it.”

Any more questions?

Two questions remain, perhaps *the* questions:

1. How much does your training cost?
2. How far will I and my employees have to travel?

My training is the best value you will

find! Register for as low as \$299 for the first person and \$259/person for additional coworkers at my Public Training Seminars. Training is available nationwide and year round, so there is a good chance I will be

coming to your area soon. If you don't find a convenient date or location, consider **On-site Training** or my regularly scheduled **Web-Based Training**.

