
Part V: Dangerous Goods
Proper Training of Employees

Dangerous Goods: Proper Training of Employees

Training - General

- Initial training is required within 90 days of employment for all employees who ship dangerous goods
- Training must also:
 - Include general familiarization, function-specific information, and safety training
 - Occur every two years if you ship by air

Employee training is an important element when shipping dangerous goods:

- If you are ever audited by the FAA, your training records are evaluated first.
- Training requirements state that an employee may only be certified in areas in which they can successfully perform their duties.
- Training is required within 90 days of employment for all laboratory employees who ship dangerous goods. Earlier training is recommended.
- Self-training is acceptable as long as it meets the requirements of Security Awareness Training, as described in the next few slides.
- Training must include general familiarization, function-specific information, and safety training.
- Training must be repeated every 2 years per IATA, every 3 years per 49 CFR

Training - General

- Retain complete records of Dangerous Goods training, including:
 - Employee name
 - Training date
 - Description, copy, or reference to training materials used
 - Name and address of company providing the training
 - Copy of completed test certification

Accurate training records must be retained in the event of an audit:

- In general, these records must include: the employee's name, the most recent training completion date, and a description or copy of the training materials used, such as a copy of this presentation.
- While it is the hazmat employer's responsibility to ensure that a hazmat employee is properly trained and tested, the employer may designate an outside source to train, test, and certify employees on their behalf. The employer must determine a trainer's qualifications based on the employer's need. Once the training is completed, the name and address of the that training organization must be retained.
- A test that ensures the employee can perform the assigned duties in compliance with the regulations is required. No specific format must be used, however. Training and testing may be accomplished in a variety of ways—performance, written, verbal, or a combination. Once the test is completed, a copy of the certification issued must be retained.

Training - Security Awareness

- Security Awareness Training fulfills the requirements of 49 CFR 172.704 (a)(4)
- Security Awareness Training is required for all laboratory employees who ship dangerous goods:
 - Required within 90 days of employment
 - Recommended as soon as possible

Security Awareness Training is required for all employees who ship dangerous goods:

- Fulfills the requirements of 49 CFR 172.704 (a)(4).
- Required within 90 days of employment.
- Recommended as soon as possible.

Training - Security Awareness

- Security Awareness Training must include:
 - Risks of transporting dangerous goods
 - Methods of enhancing transport security
 - Ways to recognize security risks
 - Steps for responding to security threats

Security Awareness Training must include:

- Risks of transporting dangerous goods.
- Methods of enhancing transport security.
- Ways to recognize security risks.
- Steps for responding to security threats.

Training - Written Security Plan

- Some shipping commodities require a written security plan—two of these are often used by laboratories:
 - Highway Route Controlled Class 7
 - More than 25kg of 1.1, 1.2, 1.3 (explosives)
 - More than 1L package of Poison Inhalation Hazard Zone A
 - Bulk hazmat packages \geq 3500G
 - Quantity requiring placards
 - Select agents or toxins

There are six shipping commodities that require a written security plan:

- The areas that usually pertain to us are the Quantity Requiring Placards and the Select Agents or Toxins.
- If you transport, ship, or offer any of these commodities, you must have a written security plan and provide in-depth Security Training--in addition to Security Awareness Training.

Training – In-depth Security Training

- Employees handling commodities that require a written security plan must complete In-depth Security Training in addition to Security Awareness Training
- In-depth security training must include:
 - Actions to take during a security breach
 - Company security objectives
 - Specific security procedures
 - Employee responsibilities
 - Organizational security structure

Employees who handle commodities that require a written security plan:

- Must complete In-depth Security Training in addition to Security Awareness Training
- In-depth security training must include:
 - Actions to take during a security breach
 - Company security objectives
 - Specific security procedures
 - Employee responsibilities
 - Organizational security structure
- If you need assistance with In-depth Security Training, the DOT has a free security training module that you can order online.

General Security Guidelines

- General industry guidelines for the security of dangerous goods:
 - Keep storage areas locked
 - Keep updated and accurate inventories
 - Conduct regular inspections of storage areas
 - Conduct security spot checks of personnel and vehicles
 - Lock all equipment
 - Be alert for unusual purchases or odd behavior
 - Restrict access of non-employees

In general, train employees to follow industry guidelines for the security of dangerous goods. This includes:

- Keeping storage areas locked.
- Keeping updated and accurate inventories.
- Conducting regular inspections of storage areas.
- Conducting security spot checks of personnel and vehicles.
- Locking all equipment.
- Being aware of unusual purchases or odd behavior by employees
- Restricting laboratory access of those who are not employees.

Emergency Response Information

- Emergency response information is required per 49 CFR (subpart G of part 172)
- Emergency response information includes:
 - Proper shipping name, “Infectious Substance Affecting Humans”
 - Technical name
 - Telephone number for use in the event of an emergency
 - Shipper’s Declaration for Dangerous Goods
 - Store in vehicle when transporting by ground
 - Keep one copy for two years

Per 49 CFR, employees must be knowledgeable in emergency response information for all infectious substances. This includes:

- Proper shipping name of the substance, “Infectious Substance Affecting Humans.”
- Technical name of the substance.
- Telephone number for use in the event of an accident or other emergency.
- Ensure the Shipper’s Declaration for Dangerous Goods document is stored in the vehicle when transporting by ground carrier. Three copies of the Shipper’s Declaration for Dangerous Goods must be included when transporting by air.

Emergency Measures

- Take measures to protect yourself and your employees who ship dangerous goods:
 - Participate in training
 - Lab safety
 - OSHA
 - Employee Right to Know (ERTKA)
 - Always wear gloves
 - Treat all spills as if they were infectious

Employees can protect themselves when shipping dangerous goods by:

- Participating in training--including the employer's lab safety training, OSHA training, and Employee Right to Know training.
- Wearing gloves at all times.
- Treating all spills as infectious substances.