

SPECIAL Report



NATIONAL ROOFING CONTRACTORS ASSOCIATION

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TRAINING FOR SAFE TRANSPORTATION OF HAZARDOUS MATERIALS

The Department of Transportation's (DOT) Research and Special Programs Administration (RSPA) issued a new rule that will affect certain roofing contractors. Called HM-126 *Training for Safe Transportation of Hazardous Materials*, this rule may require additional training and testing for employees who handle hazardous materials.

According to DOT, the purpose of this rulemaking is to ensure that each employer trains its employees the proper loading, unloading, handling, storing, and transporting of hazardous materials and the emergency preparedness needed for responding to accidents or incidents involving the transportation of hazardous materials. (A list of hazardous materials may be found in "The Hazardous Materials Tables" of the *Hazardous Materials Regulations*.) The employer is required to certify and document that this training has taken place.

There are four categories of training that must occur. Take special note of who is considered a covered employee (see underlined tasks above). For example, a warehouse employee who loads the truck is subject to the training requirements. Employees are required to participate in and be tested on the areas listed below that would apply to their jobs. RSPA does not intend to have duplicate training occurring. This means that if your OSHA Hazard Communication Program or *Federal Motor Carrier Safety Regulation's* (FMCSRs) Commercial Drivers License (CDL) Program, for example, covers the training that is required by this rule, you need not duplicate the training. DOT does not provide specific requirements for testing employees because of its "performance-oriented" approach. You must, however, keep records of the training you have provided.

The four areas of employee training are:

1) General Awareness/Familiarization Training

This training is intended to raise a employee's awareness of the *Hazardous Materials Regulations* and the purpose and meaning of its hazard communication requirements. All employees that interact with a hazardous material must receive this training.

2) Function-specific Training

This training is intended to teach the necessary safety

knowledge, skills, and abilities to an individual whose job requires interaction with a hazardous material. For example, an employee who is responsible for filling out hazardous material shipping papers needs to receive training on Subpart C of Part 172 of the *Hazardous Materials Regulations*.

3) Safety Training

This training is aimed at employees who handle or transport packaging containing hazardous materials during the course of transportation, such as warehouse workers, and for persons who have the potential for exposure as a result of an accident, such as drivers. The training should include information regarding the dangers of handling the hazardous material under normal circumstances or in likely accident scenarios. Instruction would include using proper personal protective equipment and what immediate action to take in case of accident.

4) Driver Training

Drivers must have training in the previous three areas and this section, which requires training on the safe operation of the motor vehicle that employees operate, including all of applicable requirements of the FMCSRs. Those drivers who have CDLs with the hazardous material and/or tank vehicle endorsement are likely to have satisfied this area of training.

Driver training shall include the following subjects:

- 1) Pre-trip safety inspection;
- 2) Use of vehicle controls and equipment;
- 3) Operation of vehicle;
- 4) Procedures for navigating tunnels, bridges, and railroad crossings;
- 5) Requirements pertaining to attendance of vehicles, parking, smoking routing, and incident reporting; and
- 6) Loading and unloading of materials

The design of the training program is left up to the employer; detailed content of a training program is not specified. As part of its performance-oriented approach, RSPA is encouraging training that is specific to the operation. The responsibility for ensuring that the level of training is adequate and appropriate for each employee is also left up to the employer.

Documentation must be maintained that reflects the following:

- 1) The employee's name;
- 2) The most recent completion date of the training;
- 3) A description, copy, or the location of the training materials used to meet the requirements of the rule;
- 4) The name and address of the person providing the training; and
- 5) Certification that the employee has been trained and tested.

Training must initially occur according to the following

timetable and then at least once every two years thereafter:

- 1) Training for employees employed on or before November 15, 1992, must be completed prior to April 1, 1993.
- 2) Training for employees hired after November 15, 1992 must be completed within the first 90 days of employment.
- 3) An employee who changes hazardous materials job functions must complete training in the new job within 90 days after the change.
- 4) An employee described in 2) or 3) above 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 employee.

Relevant training received from a previous employer or other source may be used to satisfy these requirements provided a current record of training is obtained from the previous employer or from the outside private or public training source.