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Subject: Blue Alert: Awareness and Recognition of DOT Hazardous Materials Requirements

TITLE: Blue Alert: Awareness and Recognition of U.S. Department of Transportation Hazardous Materials Requirements

IDENTIFIER: L-2001-OR-BJCX10-0301 DATE: 03/22/2001

LESSON LEARNED STATEMENT: General awareness training is required for all employees who in the course of their employment may directly affect hazardous materials transportation safety. Hazmat employees must be provided general awareness/familiarization training to enable the employee to recognize and identify hazardous materials per 49 CFR 172.704(a)(1).

DISCUSSION: An employee recently transported a liter-sized compressed gas cylinder across public roads unaware that there were requirements in the Hazardous Materials regulations that applied to this action. In a separate event an employee transported a sealed radioactive calibration source across public roads without recognizing the requirements. And in another recent event an employee transported hazardous materials without proper packaging or documentation and was unqualified in part due to lack of training. In each of these cases there was a failure to recognize a hazardous material and the requirements that apply to the movement of such materials. All too often efforts are focused on the high profile transportation activities such as waste shipments, feed materials, products, etc. and the small everyday items are overlooked. While the Hazardous Materials regulations do include certain exemptions and exceptions for small quantities of material or materials of trade, the employee still needs training to recognize that a hazardous material is involved and needs to be informed of the regulatory requirements.

ANALYSIS: According to 49 CFR 172.704(a) a Hazmat employee's training shall include General awareness / familiarization and function specific training. A Hazmat employee is a person employed by a person who uses one or more of their employees in connection with the transportation of hazardous materials in commerce and who directly affects transportation safety in the performance of their work per 49 CFR 171.8 (see definition of Hazmat Employer and Hazmat Employee). The employee who transported the gas cylinder could have met requirements had the employee been informed of the presence of a hazardous material and regulatory requirements.

RESOLUTION: Facilities where hazardous materials are present should ensure that ALL employees who in the course of their employment affect transportation safety receive general awareness / familiarization and job-specific training. Identification of hazards is an essential step prior to performing any task.

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REFERENCES: Occurrence Reports: ORO--BJC-X10WSTEMRA-2000-0005, ORO--BJC-X10WSTEMRA-2000-0001, ORO--BJC-X10ENVRES-2000-0026

DOE FUNCTIONAL CATEGORIES: PT - Packaging & Transportation; TQ - Training & Qualifications

FUNCTIONAL CATEGORIES: TR - Transportation Safety

WORK ACTIVITY: DR - Driving

HAZARD: OT - Other