
DEPARTMENT OF TRANSPORTATION (DOT) HAZARDOUS MATERIAL TRAINING, REGISTRATION, AND SECURITY REQUIREMENTS

Iowa Waste Reduction Center / University of Northern Iowa
319-273-8905 or 1-800-422-3109

49 CFR Parts 107 and 171-180

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Note – All references to hazardous material includes hazardous waste.

Does general hazardous material training apply to my operation?

General hazardous material training is required for all facility employees that:

- Load, unload, or handle hazardous materials
- Prepare hazardous material for transportation
- Transport hazardous material

Employee Training Requirements

Hazardous material training must include:

- Awareness of the DOT hazardous material requirements including recognition and identification of materials considered hazardous.
- Safety training concerning emergency response to protect employees from workplace hazards.
- Specific training associated with workplace duties including facility and transportation security (In-depth security training may also be required for some facilities as discussed in the Security Requirement Section below).
- Updates related to applicable regulatory changes.

Training Frequency

- New employees must be trained within 90 days of entering a job involving management or handling of hazardous materials.
- Retraining is required at least once every 3 years.

Employer Requirements

- Assure employees involved in hazardous material management or handling have received adequate initial and 3-year cyclic training (New employees may work under direct supervision of a properly trained employee for up to 90 days prior to training).
- Test and certify employees managing or handling hazardous materials are competent in their related job function.
- Retain records of training and certification for at least three years.

Note – Facilities that use full-service hazardous waste management companies may be exempt from training requirements if the waste management company provides all facility hazardous material management and handling activities. Contact the IWRC for additional details.

Does hazardous material registration apply to my operation?

DOT hazardous material registration and payment of fees apply to any facility that, during any given year, transports or offers for transport on public roads the following:

- A highway route-controlled quantity of Class 7 (radioactive) material.
- More than 25 kg (55 pounds) of Division 1.1, 1.2 or 1.3 (explosive) material.
- More than 1 liter (1.06 quarts) per package of material considered extremely toxic by inhalation.
- Any other quantity of hazardous material that requires transport vehicle placarding under the provisions of 49 CFR Part 172 Subpart F. (Hazardous wastes subject to this criterion include combustible/flammable liquids (i.e., solvents), corrosives, and toxic wastes (i.e., metal bearing sludge) in amounts greater than 1,001 pounds).
- A hazardous material (including hazardous wastes) in a bulk packaging having a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids.
- A shipment in other than a bulk packaging of 2,268 kilograms (5,000 pounds) gross weight or more of one class of hazardous materials (including hazardous wastes) for which placarding of a vehicle, rail car, or freight container is required for that class.
- A quantity of hazardous material that requires placarding. The offering and transporting of hazardous materials by farmers in direct support of their farming operations are accepted from this category of activities requiring registration.

Note – Exemptions may apply to agricultural-related transportation.

Registration Requirements

Facilities that meet any of the above criteria must:

- Submit an annual registration (DOT Form F 5800.2) by June 30 (The registration form is available at <http://hazmat.dot.gov>).
- Pay applicable registration and processing fees (see page 6 of the Hazardous Materials Registration Program at the following link;
http://www.phmsa.dot.gov/pv_obj_cache/pv_obj_id_CD5BB95B5F0C402B580855F6DFB32AFF90510A00/filename/HAZMAT%20REG%20BROCHURE%20AND%20FORM%20REV%20032811.pdf
- Maintain copies of the submitted registration form and the corresponding DOT Certificate of Registration for a minimum of 3 years.

Do hazardous material security requirements apply to my operation?

DOT hazardous material security plan and in-depth security training requirements apply under the same criteria addressed above for registration. As a result, facilities subject to registration are also subject to the following DOT security requirements.

Security Plan Requirements

A security plan should include an assessment of possible transportation security risks for shipments of hazardous materials and appropriate measures to address these risks. This includes:

- Means to confirm information provided by job applicants hired to work with or that have access to facility hazardous materials.
- Means to eliminate or reduce the risk of unauthorized access to facility hazardous materials and/or transportation equipment.
- Means to address security risks related to off-site transportation of hazardous materials, including shipments stored incidental to transportation.
- The written security plan must be retained for as long as it is in effect and be readily available to employees responsible for its implementation. The security plan must be updated as necessary to reflect changing circumstances.

Security Training

All employees involved in the packaging, handling and/or transportation of hazardous materials at a facility that is required to have a Security Plan must receive in-depth security training within 90 days of employment that addresses:

- Security risks associated with hazardous material transportation and methods designed to enhance transportation security.
- How to recognize and respond to security threats.
- Familiarity with the facility's Security Plan including security objectives, specific security procedures, employee responsibilities, actions to take in the event of a security breach, and the facility's organizational security structure.

For more information on security plan requirements and training, please visit the following web link: <http://phmsa.dot.gov/hazmat/security>.