



U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
Air Traffic Organization Policy

ORDER
JO 6000.205

Effective Date:
08/25/2014

SUBJ: Mandatory Hazardous Materials Transportation Training for Technical Operations Personnel

1. Purpose of this Order. The purpose of this order is to ensure that personnel in Technical Operations Services in the Air Traffic Organization involved in shipping hazardous materials meet the training requirements for transporting hazardous materials and hazardous waste. This training is mandated by U.S. Department of Transportation (DOT) regulations.

2. Audience. This order applies to Technical Operations employees who ship hazardous materials or supervise employees who ship hazardous materials.

3. Where Can I Find This Order. You can find an electronic copy of this order on the Directives Management System (DMS) website: https://employees.faa.gov/tools_resources/orders_notices/, or go to the MyFAA Employee Website, select "Tools and Resources", then select "Orders and Notices".

4. Requirements.

a. Technical Operations personnel who perform any of the duties specified in 49 CFR §171.1(b) are subject to the training requirements in the DOT Hazardous Materials Regulations (49 CFR Parts 171 – 180), including but not limited to the following functions:

(1) Employees who prepare hazardous materials for commercial transport (e.g., selecting packaging, choosing and affixing required labels); or

(2) Employees who prepare and/or sign shipping papers for hazardous materials or manifests for hazardous wastes; or

(3) Employees who load or unload shipments of hazardous materials on to or from a commercial transport vehicle.

b. For employees who perform the aforementioned duties, DOT hazardous materials training courses developed in accordance with 49 CFR Parts 171-180 must be completed and maintained current every three years in order to meet the DOT training requirement.

c. The training must include general awareness/familiarization with the DOT hazmat transportation regulations; information relevant to the functions performed by the employee; safety related information including emergency response; and security. All hazmat employees must be tested on the training subjects covered (see 49 CFR §172.704).

d. Personnel must work with their local training coordinators to have external training recorded in the eLearning Management System (eLMS) to receive credit. Completion of external courses must be recorded in eLMS under course FAA68000218.

e. Additional requirements may apply to personnel involved in the shipping of hazardous materials via aircraft. Personnel who ship hazardous materials using commercial carriers that ship in accordance with International Air Transport Association (IATA) requirements must receive IATA training.

f. To accomplish full hazmat training for employees who require it, managers and supervisors must identify staff that requires DOT hazardous materials training based on their work activities as stated in paragraph 4a. In addition, it is recommended that at least one person from each System Support Center take the training. Managers and supervisors should coordinate with the Training and Administration Support Team at the service center to insert training requirements in the eLMS training plan for employees in need of this training.

5. Distribution. This order is distributed to all Technical Operations field offices with a standard distribution.

6. Background.

a. Personnel in Technical Operations Services maintain and operate thousands of facilities in the National Airspace System. These facilities use a variety of materials for their operations, such as batteries, compressed gas cylinders, solvents, radioactive materials, polychlorinated biphenyls, asbestos, and pesticides, which may be classified as hazardous material. The Federal hazardous materials transportation law (49 U.S.C. § 5101 et seq.) regulates the transportation of hazardous materials (hazmat) in the U.S. The regulations promulgated under this statute are contained in 49 CFR Parts 171 – 180. The DOT's Pipeline and Hazardous Materials Safety Administration (PHMSA) is the DOT mode responsible for promulgating the regulations applicable to hazmat shippers and carriers from all transportation modes.


b. PHMSA requires that hazmat employers, including the Federal Aviation Administration (FAA), train all hazmat employees in accordance with the hazmat regulations (HMR) in 49 CFR §§ 172.700 – 172.704. FAA personnel shipping hazardous materials without proper training and/or labeling may be held personally liable for incorrect or illegal shipments of hazardous material.

c. The act of preparing, packaging, and shipping hazardous materials in commerce (i.e., using commercial services such as Federal Express or United Parcel Service) triggers the requirements of the HMR, including training requirements. Government personnel who transport hazardous materials using government vehicles are not conducting transportation “in commerce” as defined in 49 CFR §171.8, and are therefore not subject to the DOT hazardous material training requirements.

7. References.

a. 49 CFR Part 172, Subpart H: Training. Available online:<http://frwebgate.access.gpo.gov/cgi-bin/get-cfr.cgi?TITLE=29&PART=172&SUBPART=H&TYPE=TEXT>

b. DOT Pipeline and Hazardous Materials Safety Administration Training Requirements
<http://phmsa.dot.gov/hazmat/training/requirements>.



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