

Comments

“What You Should Know – A Guide to Developing a Hazardous Materials Training Program”

April 30, 2009

name: Jeantte DeGennaro

organization: Thermo Fisher Scientific

comments: This draft program is a good resource to use as a check & balance for my existing programs. Seeing the requirements and recommendations in one place simplifies this process and ultimately can help me improve my program. Many Thanks,

name: Mark Green

organization: Alliance Air

comments: I think this gives good direction on setting up a training program and to enhance one that is already in place.

name: David Sonnemann

organization: Praxair Inc

comments: Revise ¶2 on page 1 by adding the following prior to the existing sentence. "Hazardous Materials Transportation is a process that involves people performing functions related to handling, packaging, storing, moving, loading and unloading of hazardous materials, and responding to emergency situations while such materials are in transportation. It includes drivers of vehicles transporting hazardous materials as well as employees responsible for the safety of transporting hazardous materials. The process also incorporates functions to design, manufacture, fabricate, inspect, mark, maintain, recondition, repair, or test a package, container or packaging component used in transporting hazardous materials. With such a complex process, the United States . . . cause for most hazmat transportation incidents." Reason: The additional wording provides guidance about hazmat functions for which training is required.

name: David Sonnemann

organization: Praxair Inc

comments: Revise the list of factors causing human error to read: Human error may result from a variety of factors including: o Lack of knowledge o Lack of awareness that hazmat is present o Misunderstanding of regulatory requirements o Lack of understanding of one's role during an emergency, should one occur o Failure to follow established safe procedures o Failure to anticipate, during movement of hazmat, the actions others that could lead to an incident (e.g., opening the bung on an overturned drum to see whether or not the drum is full) Reason: Lack of knowledge is a more general term that covers several bullets. More importantly, the sentence on carelessness appeared (to me) judgmental and referring to "failure to follow established procedures" de-personalizes the statement.