

Comments

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

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**comments:** The document doesn't mention (unless I missed it) the term "pre-transportation function". This is defined in 171.8 and gives 14 specific activities that make a person a hazmat employee. These 14 items are shown on P. 8 of 29 but they aren't related back to the regulatory term of pre-transportation function. This is one of the most difficult points to explain internally that functions far away from a typical shipping dock could make an employee a "hazmat employee" and therefore requires training. I would suggest that the term be included in the section on P.8 and should also be defined in the appendix definitions section.