



Members of DGTA's core committee took a major step closer to making the Association a reality

The train now departing

INSTRUCTORS If there is one sector of the business that knows more than any other about the regulations governing the transport of dangerous goods, their pitfalls and the problems of their implementation, it is probably training professionals. A new association aims to set standards and establish a certification process for these important personnel

Over the years there have been many discussions about how best to improve the standards of training provided to those involved in the transport of dangerous goods. Different initiatives have cropped up here and there, mostly without long-lasting impact. However, various current trends are pointing the way to define what it is that industry requires of its training providers and what instructors need to do to meet that requirement.

This is especially true in the US, where the Pipeline and Hazardous Materials Safety Administration (PHMSA) has asked industry to partner with it to help establish what constitutes best practice in training. Directly after that announcement, a group of trainers quickly realised that what is needed is a formalised programme for certifying trainers; only in this way can clients – hazmat employers – be assured that the training they are buying for their staff meets the requirements of the regulations.

And so, at last month's annual conference of the Council on the Safe Transportation of Hazardous Articles (COSTHA), the putative Dangerous Goods Trainers' Association (DGTA) held its kick-off meeting.

The meeting was attended by many of the volunteers who make up the 24-strong core committee. These are mostly hazardous materials trainers, both in-house and independent, together with some senior in-house compliance personnel and consultants, as well as representatives of COSTHA, the Dangerous Goods Advisory Council (DGAC) and the *Bulletin*. Three are European, three are Canadian and the remainder are US-based. The meeting was moderated by Joyce Beerbower of Safety & Compliance Services, one of the main driving forces behind DGTA.

Early steps

Between November and March, it had been decided that the idea of certifying hazardous materials trainers was a necessary move and various options were researched. An initial agenda was drawn up:

- (a) formation of an independent certification board;
- (b) development of the board's policies and procedures;
- (c) development of the eligibility criteria for certification;

- (d) development of minimum standards for knowledge, skills and abilities;
- (e) development of the evaluation instrument; and
- (f) defining minimum maintenance and renewal criteria.

It was quickly decided that it was not worth forming a separate not-for-profit organisation exclusively for dangerous goods trainers, because of the financial and administrative burdens. It was therefore decided to approach the National Environmental, Safety and Health Training Association (NESHTA) to act as a 'home' for DGTA. This would effectively eliminate the first two steps above. NESHTA acts as a focus for professional trainers in a wide range of environmental, safety, occupational health and other technical sectors.

The March 2008 meeting aimed to bring together trainers from different regions and different modes in order to discuss the types of certification and examination that should be offered, the necessary qualifications for applicants, how long certification should last and what other certifications to accept.

The relationship with NESHTA also eases

determination of the initial qualifications necessary for certification by DGTA, the first step being the Certified Industrial Trainer (CIT) examination on instructional methodology. It was tentatively suggested that the dangerous goods qualifications set out in Chapter 4 of the draft document on best practice put together by DGAC and PHMSA under their instructor best practice partnership could serve as a baseline for specific dangerous goods qualifications. This acknowledges that "There are no prescribed qualifications for hazardous materials trainers and among highly qualified trainers there is a range of career experiences." However, it does say that, "Experience in hazardous materials transportation may be gained by first working alongside a seasoned training professional and actual experience in transporting hazardous materials or a combination of the two." Additionally, it notes that, "Once qualified, instructors should continue to stay abreast of regulatory changes, or changes in company practices affecting their training programmes."

The DGAC/PHMSA draft also includes suggestions as to the required level of training skills and the management of training professionals by training organisations and companies providing in-house training. In particular, quality programmes should ensure the effectiveness of all instructors and the competency of new instructors, and should specify the minimum qualifications for new instructors. The DGTA meeting summarised the basic requirements of an instructor as follows:

- (a) to be well versed in the regulations and in actual hazardous materials transport practices;
- (b) to have received training to be sufficiently well versed in the subject matter and to have the competence to be able to address most questions that may arise during the delivery of training courses; and
- (c) to have the general skills of an educator, including good communication skills, an ability to listen and a manner that generates class participation and interest.

Different strokes

Once a candidate trainer has passed the CIT examination, the certification process will have to be structured in such a way that he or she can then select the dangerous goods speciality or specialities most appropriate to their sphere or activity. It was initially proposed that modal qualifications should be offered, perhaps along

with specific certification in Classes 1 and 7. While it was believed that this approach had merit, it was concluded that it was too limiting and that the regulations themselves offer a more logical basis. This would also help the volunteers in DGTA who will have to come up with examination questions to focus on a general core for those items that are common across all the regulations and then identify the key issues that are unique to each set of regulations. An applicant for certification can then choose which of the regulations he or she wishes to be certified to teach.

The exact titles will be determined at a later date but the main regulatory categories for examination, once the CIT has been passed, are:

- (a) the US Hazardous Materials Regulations (HMR), in Title 49 of the Code of Federal Regulations (49 CFR);
- (b) the International Maritime Dangerous Goods (IMDG) Code;
- (c) the International Civil Aviation Organisation (ICAO) Technical Instructions;
- (d) the Canadian Transport of Dangerous Goods (TDG) Regulations;
- (e) ADR/RID/ADN covering the transport of dangerous goods by road, rail and inland waterway in Europe; and
- (f) speciality examinations in radioactives, explosives, packaging and so on.

Questions for the core examination will be drawn from Chapter 1 to 7 of the UN Recommendations on the Transport of Dangerous Goods. Questions for the specific regulations will concentrate on those areas where the regulations deviate or add to those UN model regulations. For instance, questions relating to 49 CFR may concentrate on topics such as reportable quantities, combustible liquids, the 'ORM' classification, tank car standards, toxic by inhalation substances, placarding and emergency response. Candidates looking for certification under the Canadian regulations may be asked about emergency response action plans, packaging and placarding requirements, or rules for ro-ro ships. It was suggested that around 200 questions will need to be prepared for each module.

DGTA will have to decide for how long certification should last. The meeting thought five years would be about right but NESHTA works on a three-year recertification cycle. After discussion it was thought best to go for a six-year recertification period so as to fit with NESHTA.

There was a proposal that other certifications, such as that offered by the UK Civil Aviation Administration (CAA), should be accepted as being equivalent; however, after some discussion it was decided that this would be inappropriate and, if an applicant has other qualifications, he or she should find it not too difficult to pass the examination for DGTA certification.

Where to next?

Clearly there is plenty of work still to be done. Quite apart from the writing of the examination questions – and finding a way to keep them secret – DGTA needs to settle on a way of enforcing training standards and draw up a Code of Ethics. It is likely that the relationship with NESHTA will help with these questions. Nor has the putative Association yet addressed the matter of training materials.

Concern has also been expressed elsewhere that the DGTA movement rather treads on the toes of the PHMSA/DGAC partnership on instructor best practices and the PHMSA/COSTHA partnership on enhancing the image of the hazmat professional. Lyondell's Rick Barlow, who represented DGAC at the DGTA meeting, gave an overview of progress on the first initiative and Labelmaster's Neil McCulloch brought the committee up to date on the latter. Both agreed that the DGTA certification project is complementary to these partnerships and that the efforts of all three initiatives should be aligned to work in conjunction to improve the general level of professionalism in the hazmat sector.

Since the March meeting, the committee members have continued to correspond on outstanding issues and will convene again just prior to the DGAC quarterly meeting next month in Washington, DC. Another meeting may take place in August, if needed. The target is to be able to go to the Labelmaster Dangerous Goods Instructors' Symposium, due to take place in Deerfield Beach, Florida this coming October, and to announce that the Association is open for business and ready to accept applications for certification.

If that target is met, it will represent a major effort of will on the part of those pushing the process forward. Once in place, the certification process will provide customers for training services with a level of confidence in the quality of the training provided that is simply not available to many, particularly in the US, at present.



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