

Reminder: Hazmat Personnel Need to Be Properly Trained and Documented

Hospitals and medical facilities that ship radioactive sources (including radiopharmaceuticals) may be subject to inspections by the U.S. Department of Transportation (DOT), including the Federal Aviation Administration (FAA). The intent of these inspections is to ensure compliance with regulations (49 *CFR*, Parts 170–185) regarding the packaging/shipping of radioactive materials, as well as the requirements for hazardous materials (hazmat) training. Over the past couple of years, the FAA has sent hazmat literature to nearly 400 hospitals and medical facilities regarding these regulatory requirements. Shortly after the materials were sent, DOT/FAA representatives began visiting many of these facilities to provide more information and conduct inspections to ensure that medical facilities are properly shipping radioactive and other hazardous materials. Violators of the regulations may receive civil penalties as high as \$32,000 per violation.

The Hazardous Materials Regulations (HMR), specifically 49 *CFR* 172.700–704, detail the following training and documentation requirements:

Each hazmat employer must: Train and test, certify, and develop and retain records of current training (inclusive of preceding 3 y) for each hazmat employee (during the period of employment and 90 d thereafter).

Training must include: General awareness/familiarization; function-specific training; safety; security awareness; in-depth security training, if a security plan is required; and driver training (for each hazmat employee who will operate a motor vehicle).

Initial training: A new employee or an employee who changes job functions may perform hazmat job functions before completing training, provided: the employee does so under the direct supervision of a properly trained and knowledgeable hazmat employee and the hazmat training is completed within 90 d of employment or change in job function.

Recurrent training: Is required at least once every 3 y, beginning on the actual date of training. Relevant

training received from a previous employer or other source may be used to satisfy the requirements, provided a current record of training is obtained from the previous employer or source. Training must address components specified in 172.704(a) of the HMR to be considered applicable.



Hugh Cannon

Training records must include: Hazmat employee's name, completion date of most recent training, training materials (copy, description, or location), name and address of hazmat trainer, and certification that the hazmat employee has been trained and tested.

In addition to meeting the training requirements, facilities shipping hazardous materials must provide a valid emergency response telephone number that is monitored 24 h/d, 7d/wk, while the shipment is being transported. The number must be of a person or entity, not an answering or voice-messaging service, who has knowledge of the facility shipping the materials as well as the materials themselves.

Facilities shipping materials that are classified as "exempt quantities" may be required to verify that those shipments are, in fact, exempt quantities and therefore excepted from specific regulatory (49 *CFR*) requirements. Exempt quantities include limited quantities of radioactive materials (a quantity that does not exceed the material's package limits) and empty packaging (packaging that has been emptied of its contents as far as practicable but still contains some radioactivity, such as empty unit doses).

Additional information is available at <http://www.phmsa.dot.gov/> on the Web site for the Pipeline and Hazardous Materials Safety Administration, which is part of the U.S. DOT.

Hugh Cannon
SNM Director, Health Policy and Regulatory Affairs