National Transportation Safety Board
Office of Highway Safety
Washington, DC 20594

HWY24MH013

HAZARDOUS MATERIALS ATTACHMENT

Brenntag Driver Safety/DOT Training/Railcar Training SOP

(9 Pages)

BRENNTAG GREAT LAKES, LLC

S T A N D A R D O P E R A T I N G P R O C E D U R E

DATE ISSUED	DEPT	FACILITY	PREPARED BY	APPROVED BY	REVISION NUMBER	INSTRUCTION NO.
03/21	SAFETY	ALL	MS	MS	5	7070.111

DISTRIBUTION: PROCEDURES & SAFETY MANUALS

SUBJECT: Driver Safety/DOT Training/Railcar Training - Trainer Notes

OBJECTIVE: To have a procedure that outlines what may be viewed and/or discussed for each Safety Meeting.

RESPONSIBILITY: Manager of Health & Safety or Appointee

PROCEDURE

See Pages 2-8

Notes: DOT 126F Documentation of Training Checklist

Training items to discuss at a minimum and get student to agree they understand. Walk around and hands on is suggested.

Trainer Name:_____
(Please Print)

Area of Training Date/Initials

(Mark item N/A if not applicable to employee's job description)

I. General Awareness/Familiarization

Security Awareness

Facility Access _____

_____

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General Security Awareness (DOT Program) – Video from Federal Motor Carrier Safety Administration _____

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Notification Requirements for Security Issues (use BOO after reporting to Facility Security Officer and Corporate Security Officer_____

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Security Plan – BGL Logistics and Facility review with employees

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II. Function Specific Training

Driver and Loading Crew

Accident Investigation – Call supervisor, review cameras, accident, forms in permit book _____

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Bulk Shipments (Cargo tanks) – Pumps, trailers, hoses, PPE

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Emergency Notification - Call your supervisor (pass out numbers)

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HazMat Table and Classification – Table in HazMat book to each driver, review

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Labeling – Show labels on walk around, explain Lot #, hazmat, etc.

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Marking – Drum and tote show UN during walk around

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Shipping and Label Manual – 6000 and 11,000 SOPs (read lot, DOT, etc.)

Shipping Papers – Example discuss importance of reading and tagging Hazmat

1.1 **Bill of Lading (BOL) –** Tab with hazardous tags, return of IBCs

1.2 **Certificate of Analysis (COA)** - Review special instruction needs with shipment

1.3 **Certificate of Compliance (COC) –** Not too often, same procedures as above

1.4 **Special delivery instructions –** On BOL (read, read, read!)

1.5 **Safety Data Sheets (SDS)** - Instructions, review YBA, M column of BOL

2.2 **Vehicle Inspection** – Walk around with flashlight and discuss process, pre and post trip, need DVIR

2.3 **Operating Lift gate** – Discuss hook up and use (totes don't go on gate)

2.4 **Product transfer hose** - Inspect (cut end off if bad)

2.5 **Spill Kit** - Overpack kit (booms, pads, PPR, oil dry) call and get help

2.6 **Tank trailer testing and marking** – Review annual inspection markings

2.7 **Required documents in vehicle** – Show 3 ring binder and bound book, ERG check

2.8 **Hours of service/Log Books –** Hand out log letter and review process and importance

2.9 **Tire Pressure check –** Explain, One tire pressure check with BGL supplied guage at the beginning of the day to each tire. The reason in the morning is that you will not get an accurate reading on a hot tire and it is dangerous to do so to a hot tire.

2.10 **Inclement weather delivery** – No work in thunderstorms, careful driving in snow

2.11 **Required equipment for delivery** (see special instructions)

3.1 **Chocking of tractor-trailer** - ALWAYS

3.2 **Product segregation requirements** – Show DOT examples, chart

3.3 **Load securement** – No dangerous placement, pallets 4 high, bungs, straps

3.4 **Placarding** – Discuss dangerous, and placard for loads

3.5 **Coupling and uncoupling** – Inspect (leg height, solid connection to pin)

3.6 **Weight laws and limits** – Read bills weight

4.1 **Tire inspection** –Drivers are to inspect tires several times a day. The instructions for this are found in the FMCSR parts 393.75 and 392.7, 397.17. Penske only has an obligation to inspect the tires at time of an annual inspection.

4.2 **Fuel on the road** – See Penske book and receipts

4.3 **Incidents and accidents** – Report immediately, prevention

4.4 **Meals** – Reimburse overnight trips

4.5 **Load Inspection** – Every stop

4.6 **Railroad Crossings** – Stop with Hazmat and use flashers

4.7 **Speed limit** – You pay fines, don't speed

4.8 **Passengers** – Only with dispatch/manager approval and signed letter

4.9 **Smoking** – NO smoking

4.10 **Vehicle Attendance** – FMCSA rules to be followed

4.11 **Seat belt use** – Always, Always, Always _____

5.1 **Final product inspection** – Be aware or product names (Right Product, Right Package, Right Quantity, Right Time, Right Price, Right Paperwork, Safely Everytime) _____

5.2 **Empty container handling** – All points closed and outside clean of liquid

5.3 **Picking up leaking containers** – Over pack all haz, label

5.4 **Customer delivery** – Be polite, ask for customer help to be safe

5.5 **Unloading LTL deliveries** – Be safe and smart, lift properly

5.6 **Loading/unloading chemicals on/off trailer**

5.7 **Unloading and loading ton trailers** – Chlorine (Fort Wayne)

5.8 **Unloading Tank trailers** – Follow procedures, wear PPE

5.9 **Unloading chemicals into bulk storage containers** – Get customer signature on correct tank hooked to and enough room in tank

5.10 **Cargo tank attendance** – Yes, while unloading/loading

6.1 **Parking** – Safely and securely, be smart and aware of surroundings

6.2 **Undelivered bulk product** – Call back to dispatch to notify then follow comments

7.1 **Safety meetings** – As needed, call anytime

7.2 **Bonding and grounding** – Reels, straps, light system, NO short cuts

7.3 **Notification of Hazardous Materials Release** – Call in immediately to Dispatch or Health, Safety & Quality Manager, 15 minutes

7.4 **Transportation of Chlorine Cylinders** – Fort Wayne, strap and secure, kit

7.5 **OTR Drivers Stop-Off allowance** – Payment for extra stops and overnight

7.6 **Safety equipment issued to drivers** – WEAR, replaced as needed

7.7 **Fines and Citations** – Overwight "expensive, driver must pay

7.8 **COD bill of ladings** – Pick up money and return with paperwork

7.9 **Portable Tank forms** – If empty need tank #, placard as needed

7.10 **CDL standards** – Follow your rules

7.11 **Emergency Response Guidebook** – Orange book (teach how to use), have in tractor at all times

7.12 **Trip reports** – Follow guidelines

8.1 **Right-To-Know** – Hazard communication, SDS, label, etc

8.2 **NACD Responsible Distribution Process** – Review 500 SOPs, policy, poster

8.3 **Portable Fire Extinguishers** – PASS, pull, aim, squeeze, sweep

8.4 **Evacuation** – Too big to handle, save lives run

8.5 **Hazardous Materials Training** – Chemical characteristics, DOT classes, etc.

8.6 **Process Safety Management** – Very hazardous chemicals need process controls

8.7 **Alcohol and Drugs** – NO (we will test according to policy)

8.8 **Confined Space** - Do not enter, by permit only

Drum and Tote Filling and Tote Testing – Fill totes with dust cap off, valve must hold (check test date to 2 ½ year time)

Brenntag Packaging Procedures – 6000 SOPs, special Food Grade batch instuctions, PPE

Closure Statements – Use proper gaskets and seals if tamper proof needed

Drum/Tote Torque Wrenches – Need proper closure tightness

Drum Inspections – Inside light checks

Bonding and Grounding – Always with flammable or not

Other:

Compressed Gas Container Handling – Fort Wayne

Hazardous Waste – Train for facility and driver pick ups

Hydrostatic testing of Cylinders – Send out to conditioner/testor (check tank marking)

Tank Trailer Testing and Marking - Check and don't drive if out of test

Railcar:

Placarding – Review placards when arrives to product shipping papers

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_____

Shipping Papers – Note return paperwork

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Rail Unloading – Follow procedure

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Return Empty Cars – System important to be tight

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III. Safety Training

Emergency Response Information – Contingency/Emergency Plan

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Measures to protect employees from HM hazards – PPE, process, procedures

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Proper procedures for handling HM packages – UN containers spaced for product

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IV. Other – Handouts (optional)

Job 7 Cards _____
Business Card of Trainer _____
Badge _____

*Take tests specific to job. Discuss answers. Complete and hand in at end.

Documentation Information:

Hazardous Materials Employee (print): _____
Employee Signature: _____
Employee SSN: _____
Hazardous Materials Employer: Brenntag Great Lakes, LLC _____
Brenntag Great Lakes, LLC Location: _____
Trainer's Name & Home Address: _____

_____

_____

Location of Training: _____
Trainer's Signature: _____
Date of Training: _____
Date of Certification completion: _____

This is to certify that the Hazmat employee listed above has been trained in accordance with the requirements prescribed in Title 49 CFR 172.700 – 172.804.