



EAC

No. 175

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Manual and Training Program Requirements For Operators Regarding Transport of Dangerous Goods

General

This Egyptian Advisory Circular (EAC) provides certificate holders with information based on ECAR Part 175, The International Civil Aviation Organization (ICAO) Technical Instructions for the Safe Transport of Dangerous Goods by Air as amended and International Air Transport Association (IATA) Dangerous Goods Regulations (Current Edition) regarding Transportation of Dangerous Goods. Personnel having duties and responsibilities in the acceptance, handling, and carriage of dangerous goods typically include the following categories:

- 1- Shippers, Cargo Agents and Operators' Cargo Acceptance staff
- 2- Load planners and cockpit crew
- 3- Screening Staff, Passenger Handling Staff, Cabin Crew; and
- 4- Loading and Warehouse Personnel

All Part 121 operators are required to provide training on the identification of dangerous goods to their personnel. Those operators who transport dangerous goods must include procedures for handling these materials in their operations manuals. These operators must also have an approved training programs to train their personnel in the use of these procedures.

Operators that choose not to carry dangerous goods must have a dangerous goods recognition program. Operators who do not accept, handle, or store dangerous goods must provide procedures, training programs and instructions in the operator's manuals.

NOTE: The same requirement to notify and train operational personnel exists for any operator that employs contract personnel to perform these services on behalf of the operator. The operator is responsible to ensure all contractors they use meet the requirements of ECAR Part 175.

Manual Contents Of Operators That Will Accept And Transport Dangerous Goods

Each manual must contain instructions and procedures that will ensure:

- The material is properly packaged in accordance with the packaging rules; is properly marked, labeled, and documented; is within the quantity limitations; and is accompanied by the proper shipping documents;
- The package is not leaking or damaged and is an authorized package in accordance with the applicable regulations;
- The goods are properly identified and labeled as being authorized for carriage in passenger or cargo-only aircraft;
- The goods are identified by their proper shipping name, classification, and identification number;
- The packages are properly marked and labeled;
- Shipper certificates are reviewed for proper information, and

- Shippers are notified in the event the package is damaged during shipment.

Storage

- The storage of corrosive goods next to or in contact with flammable solids or oxidizing goods must be prevented;
- The storage of radioactive goods labeled yellow II and/or yellow III will not exceed 50 transport indexes (TI) in a single storage location;
- Radioactive goods labeled yellow II and/or yellow III are stored in an area which is isolated from office personnel and pedestrian traffic. Additionally, when packages are marked as containing undeveloped film, the minimum separation distances prescribed in the regulations should be maintained for radioactive goods labeled yellow II and yellow III;
- The storage of packages bearing a poison label will not be in the same location as foodstuffs, animal feeds, or any edible goods intended for consumption by humans or animals.

Loading/Notification

- Loading of dangerous goods in aircraft in accordance with ICAO and IATA requirements;
- Loading and carriage of dangerous goods in cargo-only aircraft, when other means of transportation are not available or impracticable;
- Loading of radioactive goods;
- Loading of dangerous goods in cargo compartments or freight containers;
- Loading Other Regulated Goods;
- Prohibiting the loading of packages bearing a poison label in the same compartment with foodstuffs, feeds, or any edible goods intended for consumption by humans or animals unless both commodities are in separate and closed freight containers;
- Procedures for notification of the pilot in command when and where dangerous goods are loaded in an aircraft;
- Procedures for reporting dangerous goods incidents;
- Procedures for handling damaged packages and radioactive contamination; and
- Procedures for handling packages bearing a poison label.

Manual Contents of Operators Not Accepting Dangerous Goods

- Operators who do not accept, handle, or store dangerous goods will have manuals, which contain training program procedures and instructions to ensure that:
- Procedures and information are provided to ensure that all personnel responsible for accepting and handling any cargo or packaged materials receive adequate training on the recognition of items classified as hazardous materials or dangerous goods (Adequate is defined "operationally" as the demonstrated ability of required personnel to identify such items).

- Procedures and instructions are provided to ensure that no packages are accepted by the operator that contain a hazardous material.
- Procedures and instructions are provided for reporting damaged packages found to contain, or that are suspected of containing, hazardous materials or dangerous goods (in compliance with ECAR 175.45, "Reporting Hazardous Materials Incidents").

Dangerous Goods Training Programs

Training manuals should contain adequate procedures and information to assist personnel in identifying packages marked or labeled as containing dangerous goods. These should include instructions on the acceptance, handling, and carriage of dangerous goods. Additionally, the manuals should include instructions governing the determination of proper shipping names and hazard classes, as well as, packaging, labeling, and marking requirements. The information requirements for shipping papers, compatibility requirements, loading, storage, handling requirements and restrictions should also be included.

The certificate holder is responsible for assuring that any person who performs packaging, loading, or handling operations of dangerous goods has received appropriate training.

All personnel responsible for tasks involving dangerous goods will receive initial training and recurrent training on an annual basis through ECAA approved training programs that have been established or are otherwise used by the certificate holder. These programs should include information on the employees' tasks concerning the identification, handling, storing, loading, unloading, and transporting of dangerous goods. The following is a listing of suggested minimum training subjects. Instructions should be based on information found in the ECARs, ICAO, IATA regulations and other references. Operators not accepting or transporting dangerous goods need only train in the subjects, which are indicated with an asterisk.

- *General Philosophy and Applicability;
- *Limitations;

- *Dangerous goods and classifications;

Shipper's Declaration and other relevant documentation;

- *Packaging, marking, and labeling;

Loading, unloading, and handling;

Pilot Notification ;

- *Reporting dangerous goods incidents/deficiencies; and

- *Emergency Response.

Each certificate holder shall maintain records of satisfactory completion of initial and recurrent training given to personnel who are assigned the tasks and responsibilities for the handling and carriage of dangerous goods. All required training will be documented and these records will be maintained at the location where the personnel perform such tasks.

Finally, operators who engage in commercial transportation of passengers shall display notices to passengers informing them that dangerous goods may be carried aboard the aircraft. These notices will be prominently displayed in each location at an airport where the operator issues tickets, checks baggage, and maintains aircraft boarding areas.

Procedures for Acceptance of Hazardous Materials and Dangerous Goods Manuals.

Whereas the hazardous materials or dangerous goods training programs are "approved," the hazardous materials or dangerous goods manuals are "accepted." In general, the same procedures used for the approval of dangerous goods training programs apply to the acceptance of hazardous materials or dangerous goods manuals.

Exemptions.

ECAA may grant exemptions from the provisions of the ICAO Technical Instructions (TI - 1.1 General Applicability) provided that in such cases an equal level of safety of transport is achieved.

When an operator applies for either an initial ECAA exemption or the renewal of an exemption for the carriage of certain hazardous material in Civil Transport by Air, the ECAA inspectors will need to review the compliance history of the certificated operator. There are two types of exemptions: an exemption, which is valid for 2 years and, an emergency exemption that is issued to the shipper who hires and provides the name of the operator in the exemption. The emergency exemption is normally issued exclusively for one time only shipments.

Appendix 1 Sources of Information.

The following regulations and publications pertaining to the safe transportation of hazardous materials or dangerous goods are available for purchase and can be obtained from the addresses listed below:

A. International Sources.

International sources of information pertaining to the safe transportation of hazardous materials or dangerous goods are as follows:

(1) U.S. CFR, Title 14, Aeronautics and Space, Parts 91, 121. This reference contains the regulations that are applicable to air carrier and air taxi operations and helicopter operations, and defines the duties and responsibilities for conducting training programs and procedural manuals dealing with the air transportation of hazardous materials or dangerous goods.

(2) U.S. CFR, Title 49, Transportation, Parts 100 - 177 {Parts 106, 107, 171, 172, 173, and 175} and 178 - 199. These regulations deal with the proper identification, classification, packaging, labeling, marking, and certification of hazardous materials or dangerous goods transported in commerce. These national sources of information may be obtained from the following address:

Superintendent of Documents
Public Document Department
Government Printing Office
Washington, DC 20402
Phone: (202) 783-3238

(3) U.S.FAA Advisory Circular (AC) 121-21B, "Information Guide for Training Programs and Manual Requirements in the Air Transportation of Hazardous Materials."

(4) ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air. These technical instructions amplify the basic provisions of Annex 18 to the Convention on International Civil Aviation, and contain detailed instructions necessary for the safe international transport of dangerous goods by air. These regulations are issued in a 2 year edition on alternate Septembers, becoming effective the following January 1.

(5) IATA Dangerous Goods Regulations. These regulations are published by the International Air Transport Association (IATA) for their members and associate members. With few exceptions, they are closely aligned with the ICAO Technical Instructions. These regulations also provide the operator exceptions and, in certain instances, state variations, which may not be included in any other publication. IATA dangerous goods regulations are published on an annual basis and may be obtained from the following address:

i International Civil Aviation Organizations (ICAO)
Egyptian Civil Aviation Holding Company
Complex Building
Cairo International Airport Road

ii Labelmaster
5724 North Pulaski Road
Chicago, Illinois 60646
Phone: (800) 621-5808 or (312) 478-0900 and

iii International Air Transport Association (IATA)
2000 Peel Street
Montreal, Quebec
Canada H3A 2R4

B. Other International Regulations Dealing With Hazardous Materials or Dangerous Goods.

Other international regulations dealing with hazardous materials or dangerous goods are as follows:

(1) United Nations Publication, Transport of Dangerous Goods. These recommendations were prepared by the United Nations Committee of Experts on the Transport of Dangerous Goods, document No. ST/SG/AC.10, and may be obtained from the following addresses:

Labelmaster
5724 North Pulaski Road
Chicago, Illinois 60646
(800) 621-5808 or (312) 478-0900

And
United Nations Publications
United Nations Building
Room A-3315
New York, New York 10017

(2) International Atomic Energy Agency (IAEA) Regulations for the Safe Transport of Radioactive Materials, Safety Series No. 6, document no. STI/PUB/323. These regulations provide the international standards for the transport of radioactive materials as promulgated by IAEA and are the regulations which the Department of Transportation and the U.S. Nuclear Regulatory Commission have drawn from amending Title 49 CFR and Title 10 CFR Part 71.

(3) International Atomic Energy Agency (IAEA) Safety Series No. 37, Advisory Material for the Application of the IAEA Transport Regulations. This information may be obtained from the following organization:

UNIPUB
1180 Avenue of the Americas
New York, New York 10038

C. Training Material.

ICAO and IATA have jointly developed training documents in support of the provisions contained in Annex 18 to the Convention on International Civil Aviation. These documents help achieve uniform, international levels of training for all aspects of handling and transporting dangerous goods by air and may be useful for establishing training programs. These training documents are comprised of a series of four self-help-training manuals for a particular category of personnel involved in the transport of dangerous goods by air.

(1) The four books are entitled:

Book 1: Shippers, Cargo Agents and Operators' Cargo Acceptance staff

Book 2: Load planners and cockpit crew

Book 3: Screening Staff, Passenger Handling Staff And Cabin Crew

Book 4: Loading and Warehouse Personnel

(2) This series of training manuals may be obtained from one of the following offices:

International Civil Aviation Organization
Attention: Distribution Officer
1000 Sherbrooke Street West, Suite 400
Montreal, Quebec
Canada H3A 2R2

or
International Air Transport Association (IATA)
2000 Peel Street
Montreal, Quebec
Canada H3A 2R4