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Hazardous Materials Transportation/COVID-19: Pipeline and Hazardous Materials Safety Administration Enforcement Policy Regarding Training

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The Pipeline and Hazardous Materials Safety Administration (“PHMSA”) issued a March 25th document titled:

Notice of Enforcement Policy Regarding Training Requirements (“Policy”)

The Policy acknowledges that hazardous materials employers may be:

... experiencing difficulty in either obtaining or providing recurrent training as required by the Hazardous Materials Regulations (HMR, 49 CFR Parts 171-180) due to the Coronavirus Disease 2019 (COVID-19) outbreak.

The Policy states that PHMSA will not take enforcement action against any hazmat employer who is unable to provide recurrent training consistent with Hazardous Materials Regulations training requirements. The stated objective is to minimize disruptions in the supply-chain.

PHMSA does note that the Hazardous Materials Regulations do not require training to be provided in a traditional classroom setting or through on the job training. Instead, it cites the following as possible methods of training delivery:

- Web-based, self-paced computer instruction
- Remotely delivered classroom instruction
- Combination of those methods

Such methods must cover the required elements found in 49 CFR 172 Subpart H.

The Policy emphasizes that it is limited to the recurrent training requirements found in 49 CFR 172.704(c)(2). It is in effect for 90 days from the date of issuance (March 25th). The Policy was authored by PHMSA Associate Administrator for Hazardous Materials Safety, William S. Schoonover.

A copy of the Policy can be downloaded [here](#).