

Drivers of Commercial Motor Vehicles: Training Requirements

Description:

Drivers of commercial motor vehicle who transport LP-gas must be trained on the requirements of U.S. DOT regulations, including hazmat employee training, specific operating procedures related to transporting hazardous materials in commercial motor vehicles, and the operating characteristics of vehicles and liquid loads.

Regulatory Reference

49 CFR Part 172,	Subpart H Training
49 CFR § 172.700	Purpose and scope (hazmat employee training)
49 CFR § 172.702	Applicability and responsibility for training and testing
49 CFR § 172.704	Training requirements
49 CFR § 177.800	Purpose and scope of this part and responsibility for compliance and training
49 CFR § 177.816	Driver Training
49 CFR § 391.55	LCV Driver-Instructor qualification files [Longer Commercial Vehicles]
49 CFR Part 380	Special Training Requirements [Applicable to: <ul style="list-style-type: none"> • LCV Driver Training and Driver-Instructors • Entry-Level Drivers]

Applies to:

The regulations apply to drivers of commercial motor vehicles transporting LP-gas and their employers.

General Requirements:

- (1) Paragraph (c) of § 177.800 states, “A carrier may not transport a hazardous material by motor vehicle unless each of its hazmat employees involved in that transportation is trained as required by this part and subpart H of part 172 of this subchapter.” Subpart H gives the requirements for hazmat employee training, sometimes called “HM 126f training.” See **Compliance Guide No. DOT 23**, revised 5/2003 in this reference for an outline of hazmat employee training requirements.
- (2) 49 CFR § 177.816 specifies additional required driver training.
 - (a) In addition to the training requirements of §177.800, no carrier may transport, or cause to be transported, a hazardous material unless each hazmat employee who will operate a motor vehicle has been trained in the applicable requirements of 49 CFR parts 390 through 397 and the procedures necessary for the safe operation of that motor vehicle. Driver training shall include the following subjects:
 - (1) Pre-trip safety inspection;
 - (2) Use of vehicle controls and equipment, including operation of emergency equipment;

- (3) Operation of vehicle, including turning, backing, braking, parking, handling, and vehicle characteristics including those that affect vehicle stability, such as effects of braking and curves, effects of speed on vehicle control, dangers associated with maneuvering through curves, dangers associated with weather or road conditions that a driver may experience (e.g., blizzards, mountainous terrain, high winds), and high center of gravity;
 - (4) Procedures for maneuvering tunnels, bridges, and railroad crossings;
 - (5) Requirements pertaining to attendance of vehicles, parking, smoking, routing, and incident reporting; and
 - (6) Loading and unloading of materials, including-
 - (i) Compatibility and segregation of cargo in a mixed load;
 - (ii) Package handling methods; and
 - (iii) Load securement.
- (b) Specialized requirements for cargo tanks and portable tanks. In addition to the training requirement of paragraph (a) of § 177.816, each person who operates a cargo tank or a vehicle with a portable tank with a capacity of 1,000 gallons or more must receive training applicable to the requirements of this subchapter and have the appropriate State-issued commercial driver's license required by 49 CFR part 383. Specialized training shall include the following:
- (1) Operation of emergency control features of the cargo tank or portable tank;
 - (2) Special vehicle handling characteristics, including: high center of gravity, fluid-load subject to surge, effects of fluid-load surge on braking, characteristic differences in stability among baffled, unbaffled, and multi-compartmented tanks; and effects of partial loads on vehicle stability;
 - (3) Loading and unloading procedures;
 - (4) The properties and hazards of the material transported; and
 - (5) Retest and inspection requirements for cargo tanks.
- (c) The training required by paragraphs (a) and (b) of this section may be satisfied by compliance with the current requirements for a Commercial Driver's License (CDL) with a tank vehicle or hazardous materials endorsement.
- (d) Training required by paragraph (b) of this section must conform to the requirements of §172.704 of this subchapter with respect to frequency and record keeping.
- (3) Special training and qualification requirements apply to
- (a) drivers of longer combination vehicles (LCVs), defined as any combination of a truck tractor and 2 or more trailers or semi-trailers that has a gross vehicle weight greater than 80,000 pounds. Generally known as doubles and triples, LCVs

transporting propane are most frequently found in western states of the United States.

The new training requirements apply to any driver of an LCV after June 1, 2004, with the exception of drivers who meet “grandfathering” criteria, as specified in 49 CFR § 380.111, who will be allowed to drive without the required training for a one-year period after June 1, 2004. Only training meeting the requirements set out in Subpart B (§§ 380.201-205) under the direction of qualified LCV training instructors (Subpart B §§ 380.301-303) may be used to comply with the new regulation. Drivers must obtain a Longer Combination Vehicle (LCV) Driver Training Certificate or a one-year Longer Combination Vehicle (LCV) Driver Training Certification of Grandfathering to be permitted to operate an LCV after June 1, 2004.

- (b) By July 20, 2004, and thereafter, motor carriers must ensure that all entry-level drivers (a driver with less than one year of experience operating a CMV in interstate commerce) are trained as required by 49 CFR § 380.503 and their training documented as required by 49 CFR §§ 380.505, 380.509-380.513. For entry-level drivers who first began operating a CMV in interstate commerce between July 20, 2003, and October 18, 2004, the compliance deadline is October 18, 2004.

Required training elements found in 49 CFR § 380.503 include:

- Driver qualification requirements
- Hours of service of drivers
- Driver wellness
- Whistleblower protection

The training provider must provide a training certificate or diploma to the entry-level driver containing the following items of information:

- (a) Date of certificate issuance
- (b) Name of training provider
- (c) Mailing address of training provider
- (d) Name of driver
- (e) A statement that the driver has completed training in driver qualification requirements, hours of service of drivers, driver wellness, and whistleblower protection requirements substantially in accordance with the following sentence:
I certify _____ has completed training requirements set forth in the Federal Motor Carrier Safety Regulations for entry-level driver training in accordance with 49 CFR 380.503.
- (f) The printed name of the person attesting that the driver has received the required training
- (g) The signature of the person attesting that the driver has received the required training

Maintenance and Review

Documentation of individual driver hazmat employee training along with the specific additional training requirements for drivers is the key to demonstrating compliance with the regulations. Many operating companies assign responsibility for maintaining the documentation to a designated person who periodically reviews the documentation to assure that initial and refresher training can be demonstrated for each driver employed. Supervisors and managers should be familiar with the regulatory requirements, and ensure that drivers are not allowed to perform hazmat employee functions, or drive placarded vehicles except when in the presence and under the direct supervision of a qualified person until required training has been documented.

Additional Information and Resources

Propane Delivery, Certification Area 2.0, Certified Employee Training Program, National Propane Gas Association, Lisle, IL

Initial OSHA and DOT Training: For the Handling and Transport of Hazardous Materials, Propane Education and Research Council, Washington, DC