

Re: Proposed Requirement for HazMat Training

This proposal will impose extensive employee notification and customer monitoring by repair stations simply because they have hazardous waste as a result of their repair processes, regardless of whether they are "hazmat employers" who are air trafficking in Hazmat. The proposed requirement would require FAA involvement in training requirements and documentation for everyone in a repair station who even handles hazardous waste and/or labels hazardous waste containers which will never be involved in air transport. Virtually all, if not all, of the training is covered in concept by the DOT requirements. However, it adds monitoring and codification of the requirements with the enhanced oversight.

It also invokes immediate notification of "all employees" of "hazmat employers" relative to the will-carry/ will-not-carry classification of all operator customers.

There is no recognition of the unnecessary burden on Repair Stations who have no involvement with air transport of hazmat. All of the examples presented appear to relate to repair stations who traffic in products or repair services wherein hazmat is involved in the end products.

Much if not all of this unnecessary burdening would be eliminated if the definition of "hazmat employer" was specific to entities (Repair Stations) involved in packaging, marking, manifesting, hazmat or submitting hazmat for potential air transport.