



Interagency Aviation TECH BULLETIN



No. IATB 17-02

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SUBJECT: Aviation Transport of Hazardous Materials

DISTRIBUTION: All Aviation Activities

ISSUE: During a review of aviation operations during the summer of 2016, an Interagency Aviation Safety Assistance Team (ASAT) identified 16 issues where vendors and helitack crews were not familiar with the requirements of the *Interagency Aviation Transport of Hazardous Materials Handbook/Guide* (IATHM). This finding was not isolated to one agency or one location, nor was it limited to exclusive use helitack crews or personnel on-Call When-Needed (CWN) assignments.

DISCUSSION: Leaders at all levels must ensure that all employees who are involved with transporting hazardous materials (HAZMAT) are trained, knowledgeable and compliant with policy. The DOI and USFS are able to carry HAZMAT with a special permit, DOT SP 9198. The special permit allows relief from certain requirements from the Hazardous Materials Regulations (HMR). It allows the use of aircraft that are under contract and operational control of DOI/USFS and other agencies to carry items identified as HAZMAT.

Strict adherence to hazardous materials transportation requirements is critical to maintaining a safe working environment. Failure to comply with these requirements may put the permit at risk, causing either suspension or revocation, and expose our organizations to penalties prescribed by the hazardous materials transportation laws.

As a reminder, DOT-SP-9198 Special Permit requires:

1. A current copy of the IATHM Handbook/Guide, dated January 2005, current copies of the DOT-SP-9198 Special Permit Authorization Letters issued to the DOI and the USFS, and the most current edition of the *Emergency Response Guide (ERG)* must be carried aboard each aircraft transporting hazardous materials. The IATHM, DOT Special Permits and authorization letters, and the ERG can be accessed at the following links:
 - DOI –OAS: <https://www.doi.gov/aviation/library/guides>
 - USDA - USFS: https://www.fs.fed.us/fire/aviation/av_library/index.html
 - DOT Pipeline and Hazardous Materials Safety Administration: <https://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Hazmat/ERG2016.pdf>
2. A current copy of the special permit, the IATHM Handbook/Guide and the ERG must be maintained at each facility where the hazardous materials are offered or reoffered for transportation. For helicopter and fixed wing operations, material must be loaded or unloaded under the direct supervision of an agency employee trained in accordance with the handbook/guide.
3. All aircraft operated under this special permit must be Government owned or under a Government contract. The aircraft must be under the exclusive direction and operational control of the DOI or USFS for the purposes of a Government function such as firefighting, search and rescue, law enforcement or resource management.

4. Vendors under operational control of the DOI or USFS shall transport HAZMAT in accordance with this special permit and the IATHM Handbook/Guide. Regardless of any FAA Air Carrier Operations Manual declaration of Will or Will Not Carry, the Contractor may be required to transport hazardous materials.
5. All personnel (Hazmat employee as defined in IATHM Handbook/Guide pg. 16) who perform a function subject to this special permit must receive training on the requirements and conditions of this permit. The National Incident Management System: Wildland Fire Qualification System Guide (PMS310-1) requires triennial completion of [A-110 Aviation Transportation of Hazardous Materials](#) for both helicopter managers and helicopter crewmembers.
6. On the first day of assignment, the required documentation must be on board the aircraft; this is part of the pre-use inspection.
 - a) The pilot must be provided initial written notification of any hazardous material that may be transported on the aircraft.
 - b) It is recommended that the Hazardous Materials Manifest form located in the IATHM Handbook/Guide ([Appendix 4, Sample 2](#)) is utilized and carried onboard the aircraft.
 - c) Once the written manifest is provided to the pilot verbal notification of subsequent hazardous material transportation will suffice.
 - d) Indication of transportation of hazardous materials on the Interagency Helicopter Load Calculation is required.

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