Operator Dangerous Goods Inspections

Regional Seminar/Workshop on the Safe Transport of Dangerous Goods

OBJECTIVES

- Explain Inspector Roles
- Explain Inspection Process

REGULATIONS

- Inspectors Assess Air Operator and Shipper compliance with:

  National Regulations (certificate) and the ICAO Technical Instructions for the Safe Transport of Dangerous Goods (ICAO TI).
REGULATIONS

Certification requirements

ICAO Technical Instructions
- Part 7 for Air Operators
- Part 5 for Shippers and Repair Stations

Assessing Air Operator Compliance

Annex 6
ICAO TI, Part 7

INSPECTION PROCESS

Three main techniques to conduct inspections.
- Observation
- Documentation Review
- Interview
INSPECTION PROCESS
Where Do Inspectors Go To Observe, Conduct Document Review and Interview Those Involved With Dangerous Goods Operations for an Air Operator?

WHERE?
- On Airport Cargo Facilities
- Off Airport Cargo Facilities
- Curbside Baggage Acceptance Areas
- Ticket Counter Baggage Acceptance Areas
- Baggage Make-up Areas
- Cargo Build-up Stations
- Cargo Transfer Points

WHERE?
- Aircraft Operations Area (Ramp)
- Air Operator Stores Facilities (COMAT)
- Air Operator Maintenance Areas (COMAT)
- Any Location Where Acceptance, Storage, Build-up, Stowage and Transport of Cargo and Baggage Occurs
## ACCEPTANCE LOCATIONS

### ACCEPTANCE LOCATION

1. Are shipments containing Dangerous Goods accepted according to the ICAO TI?

2. Are DG packages inspected using a written checklist?

3. Are packages containing dangerous goods segregated during stowage according to ICAO TI, Table 7-1 (Incompatible)?

### SEGREGATION BETWEEN PACKAGES

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**7.1.1**

**7.1.3**

**7.2.2.1**
DG REGULATION MANUALS

1. Does the local station have a current copy of the ICAO TI (updated every two years), IATA Manual, or other DG regulatory manual?

2. Is the manual available to the employees who perform dangerous goods functions?

Acceptance Location

4. Does the operator maintain a supply of replacement dangerous goods hazard and handling labels?

Information to Passengers and Shippers

1. Are DG warning signs prominently posted at each cargo acceptance location and passenger contact point?

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Recommendation – not required by ICAO TI

Acceptance Location

4. Does the operator maintain a supply of replacement dangerous goods hazard and handling labels?

Just say no to DG
EMERGENCY RESPONSE INFORMATION

1. Is an Emergency Response Guide immediately available for all shipments of dangerous goods (ICAO Doc 9481 or other guide)?

2. Is the Emergency Response Information available at all times (including during flight) to pilots/crews who operate aircraft transporting dangerous goods?

INSPECTING DG PACKAGES ON HAND

OBSERVATION AND DOCUMENT REVIEW

- Package Inspections
  - Locate and inspect the compliance of dangerous goods packages tendered to and accepted by the operator for air transport.
OBSERVATION AND DOCUMENT REVIEW

- Package Inspections
  - Document the name and address of the shipper
  - Document compliance with Shipper Requirements (marking, labeling, packaging, documentation)
  - Document signature on the transport document
  - When you conduct a Shipper’s Assessment, you should focus on this particular shipment and employee’s training record.

PACKAGE INSPECTION

1. Is each package tendered acceptable for transport by air?
2. If tendered for transport by passenger aircraft, are the dangerous goods within the specified quantity limits for Passenger aircraft?
3. Are the dangerous goods within the specified quantity limits for Cargo Aircraft?

PACKAGE ASSESSMENT

4. If the shipment is in cargo aircraft quantities per item # 3, is a “Cargo Aircraft Only” label applied.
5. Has a dangerous goods transport document been properly executed and the certification signed?
6. Is the dangerous goods package properly marked?
7. Is the dangerous goods package permanently marked with the required UN Specification Package code?

- Is the dangerous goods package properly labeled?

- Has the package and documentation been prepared using “English” unless otherwise specified in a National Program?
RAMP & AIRCRAFT

Loading, storage, inspection, etc.

OBSERVATION
1. Are packages/freight containers/Unit Load devices containing dangerous goods loaded aboard an aircraft in accordance with ICAO TI Table 7-1? (Segregation)
   7:2.2.1
2. Are packages/freight containers/Unit Load Devices containing liquid dangerous goods loaded aboard an aircraft in accordance with any orientation arrows affixed to their outer packaging?
   7:2.3

OBSERVATION
3. Are packages containing dangerous goods sufficiently secured aboard the aircraft to prevent movement that would change the orientation of liquid dangerous goods and segregation of Incompatible dangerous goods?
   7:2.4.2
4. Are packages/freight containers/Unit Load Devices containing dangerous goods handled in a manner that would prevent damage?
   7:3.4.3
OBSERVATION

7. Are freight containers/ULDs containing dangerous goods either transparent to allow visibility of markings and labels on the packages contained within or tagged with the appropriate labels on their exterior?

8. Are packages/freight containers/Unit Load Devices containing dangerous goods inspected for package integrity and any signs of leakage immediately prior to loading aboard an aircraft?

UNIT LOAD DEVICE (ULD)

OBSERVATION

5. Are apparent damaged packages containing dangerous goods removed from the transport system?

6. Are other packages that are part of a Consignment, inspected to determine their suitability to continue their journey when a damaged package containing dangerous goods is discovered?
9. Are packages/freight containers/Unit Load Devices containing dangerous goods inspected for package integrity and any signs of leakage immediately following unloading from an aircraft?

10. Does the operator provide the pilot-in-command written DG information as early as practicable.
DOCUMENT REVIEWS

Primary business location and acceptance locations

DOCUMENT REVIEW

- Air Operator Manuals
- Training Programs
- Training Records
- Regulatory Manuals
- Emergency Response Information
- DG Transport Documents
- Acceptance

- P-I-C Notifications
- Air Waybills (Master and House)
- Flight Manifests
- Consolidation Manifests
- Truck Bills
- Customs Documents
- Load Plans/Sheets

OPERATIONS MANUAL

1. Has operations manual been reviewed and approved by appropriate National Authority?

2. Does the Operations Manual state that the operator will carry cargo?

Annex 6
OPERATIONS MANUAL

3. According to the Operations Manual, does the Operator carry dangerous goods as cargo?

4. Does the Operations Manual state the Operator will carry dangerous goods as Company Material (COMAT)?

Annex 6

OPERATIONS MANUAL

5. Does the Operations Manual provide information enabling flight crew to carry out its responsibilities with regard to transport of dangerous goods and provide instructions as to action to be taken in event of emergencies arising involving DG?

Annex 6, Appendix 2 & Annex 18, 9.2

OPERATIONS MANUAL

6. Does the Operations Manual contain provisions for dangerous goods training for employees & agents who accept, inspect, handle, load, unload and store dangerous goods?

7. Does the operator’s manual contain a requirement for persons who accept, inspect, handle, load, transport, unload and store dangerous goods to be tested over the content of their training?
OPERATIONS MANUAL

8. Does the Operators Manual contain information to aid employees/agents in the recognition of undeclared dangerous goods?

REPORTING REQUIREMENTS

1. Does the operator report, within specified time limits, dangerous goods incidents to the appropriate National Authority?

2. Does the operator report, within specified time limits, dangerous goods accidents to the appropriate National Authority?

3. Does the operator report, within specified time limits, undeclared and misdeclared shipments of dangerous goods to the appropriate National Authority?
DG TRAINING PROGRAM

1. Did the operator establish and maintain an initial and recurrent training program?

2. Is DG training program reviewed and approved by appropriate authority?

DG TRAINING PROGRAM

3. Does the training program include:
   a) General familiarization training
   b) Function-specific training
   c) Safety training

4. Does the training program require understanding of the training be verified by a test and certificate issued to verify satisfactory completion?

DG TRAINING RECORDS

1. Did the operator provide training for each employee or agent involved in transport of DG by air?
   ♦ Includes those who accept, inspect, handle, load, unload and store DG as well as flight crew members
   ♦ Includes agencies employed to act on behalf of operator

2. Is recurrent training provided within 24 months of previous training to ensure knowledge is current?
DG TRAINING RECORDS

3. Does the operator retain a record of dangerous goods training for each employee/agent you observed performing DG-related function?

4. Is the training record and test current? ( Conducted within the past two (2) years?)

ICAO 1.4.2

DG TRAINING RECORDS

5. Do the training records include the following?
   a) Individual’s name
   b) Most recent training date
   c) Description, copy, or reference to training material
   d) Name and address of organization providing
   e) Copy of certification issued when individual trained which shows test completed satisfactorily

ICAO 1.4.2.4

DG TRAINING RECORDS

6. Did the operator provide training records upon request?

ICAO 1.4.2.4
DOCUMENT RETENTION

1. Does the operator maintain the following documents for three months?
   a) Transport Documents
   b) Acceptance checklists
   c) Written info to pilot-in-command

INTERVIEW

Why do we interview?

Who should be interviewed?

What type of questions should be asked?
What type of questions should be asked during interviews?

INTERVIEW

- DG Acceptance Agents
- Cargo Facility Agents
- Ramp Agents
- Flight Crew / Flight Attendants
- Ticket Counter Agents
- Sky Cap / Baggage Porter
- Boarding Gate Agents
- Customer Service

INTERVIEW

- Mechanics / Maintenance Personnel
- Stores Personnel
- Any person with responsibilities for the acceptance, handling, loading and transport of baggage and cargo.
INTERVIEW

- What is your most recent training date?
- What is DG?
- Are you allowed to accept DG?
- What classes of DG can you accept?
- How do you ensure a shipment is acceptable?
- What do you do if there is a problem with a shipment?

QUESTIONS?