



# OAS TECH BULLETIN

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Page 1 of 2

**SUBJECT:** Aviation Transport of Hazardous Materials

**DISTRIBUTION:** All Aviation Activities

**ISSUE:** The recent renewal of US Forest Service (USFS) grantee status and National Wildfire Coordinating Group's (NWCG) release of the Standards for Aviation Transport of Hazardous Materials has led to numerous questions concerning DOI's grantee status and the implementation of the NWCG Standard.

**Discussion:** The Department of the Interior (DOI) and USFS are able to carry hazardous materials (HAZMAT) as grantees to special permit DOT SP 9198. The special permit allows relief from certain requirements contained in Hazardous Materials Regulations (HMR). Carriage of HAZMAT under DOT SP 9198 requires the following:

1. Current grantee status with the DOT: Agency-specific **one page** letter with a unique expiration date. The US Forest Service was recently reissued grantee status (expiring 31 January 2022). Department of Interior has grantee status until 31 July 2018 and has initiated the renewal process.
2. SP 9198 permit: **Four page** parent document to the grantee letters. This permit covers instructions for all grantees, is not agency-specific and does not have an expiration date.
3. Hazardous materials transport instructions: Currently in the form of the Interagency Aviation Transportation of Hazardous Materials Handbook/Guide (IATHM) recently revised and rebranded as the NWCG Standard for Aviation Transport of Hazardous Materials.

There are at least two issues limiting DOI's implementation of the NWCG Standard. First, the NWCG Standard has not been signed into policy by DOI. Second, the most current revision (revision 16) of the SP 9198 permit states "All aircraft and personnel operating under the terms of this special permit must be in compliance with the requirements of the DOI/USDA-Forest Service January 2005 Interagency Aviation Transport of Hazardous Materials Guide/Handbook."

Based on this, DOI must continue to use the IATHM Handbook/Guide, dated January 2005 until the NWCG standard becomes policy and the SP 9198 permit is revised. Once the SP 9198 is revised and the NWCG standard is accepted as DOI policy new guidance will be issued to the field.

**Until further guidance is received, the following is required onboard DOI contracted/agency owned aircraft:**

1. Current DOI grantee letter
2. SP 9198 Sixteenth Revision
3. IATHM Handbook/Guide, dated January 2005
4. Current Emergency Response Guide (ERG)

The safe and legal transportation of hazardous materials is key to minimizing risk to employees. Failure to comply with the DOT special permit and IATHM may put the permit at risk, leading to either suspension or revocation, and exposing our organizations to penalties prescribed by the hazardous materials transportation laws.

The IATHM, DOT special permit, authorization (grantee) letter, and the ERG can be accessed at the following links:

- IATHM, DOT special permit and authorization (grantee) letter: <https://www.doi.gov/aviation/library/guides>
- DOT Pipeline and Hazardous Materials Safety Administration: <https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/ERG2016.pdf>

All users of the special permit are required to review the SP 9198 and IATHM to ensure compliance.

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