

**US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Hazardous Materials Enforcement**



**National Packaging Strategic Plan
August 2008**

Overview

Although PHMSA possesses jurisdictional enforcement authority over all modal hazardous materials transportation activities under the hazardous materials regulations (HMR), PHMSA primarily focuses its enforcement and oversight on non-bulk, intermediate bulk, compressed gas cylinder, and special permit packaging. Including HM shippers and some carriers, PHMSA's exclusive jurisdictional area on packaging is and has historically been assigned thru an inter-agency agreement amongst the Department's modal administrations. Sharing enforcement and oversight with its modal partners on HM shippers, PHMSA also possesses a unique and specialized expertise in HM packaging. Utilizing risk based approaches and its National Business Strategy, PHMSA's Office of Hazardous Materials Enforcement (OHME) executes its packaging program in accordance with the strategies set forth in this plan.

Mission

The mission of the Office of Hazardous Materials Enforcement (OHME), Packaging Program, is to ensure and promote the safety and performance of the hazardous materials packaging system including oversight of the manufacture, requalification, maintenance, use of hazardous materials packaging. In addition, OHME's mission is also to determine the adequacy and clarity of the regulations for which HM packaging is based. Successful execution of this mission will reduce incidents and mitigate risks attributed to the unsafe and or non-complying manufacture, maintenance and use of hazardous materials packaging.

Objectives

OHME will build capabilities and ensure packaging oversight uniformity and consistency by continuing to execute its national enforcement training program for its own investigative personnel.

OHME will identify trends and patterns of safety related packaging problems through extensive evaluation of available data and prioritize those areas and activities posing the greatest risk. Continually pursuing additional relevant data sources, OHME will focus its enforcement and oversight resources on those packaging activities posing the greatest transportation risk.

OHME will work to expand its data sources through its working partners and alliances in government and industry to enhance its data analysis that increases the accuracy and effectiveness of its decisions on packaging safety.

OHME will utilize inspection and testing approaches that, while maintaining the standards of the HMR, offer alternative processes in the verification and validation of packaging integrity and design.

OHME will aggressively target persons that commit egregious non-compliance and by their actions pose serious safety concerns and risk. OHME will swiftly and aggressively work to eliminate or mitigate any risk and suspect activity.

OHME will seek to improve consistency and work towards uniform testing protocols by working closely with manufacturers and test facilities to better understand the variances in testing technique and equipment. This process includes the evaluation and standardization of shelf life for packaging testing.

OHME will foster and support more effective quality control programs within packaging manufacturing operations and encourage feedback regarding production anomalies . Sharing information will lead to a better understanding of unique safety issues others may encounter.

OHME will magnify its outcomes by leveraging its hazardous materials packaging resources through internal and external training, education, and outreach.

OHME will work to towards operational transparency with the regulated industry and other stakeholders. Packaging program operating protocols, procedures and policies will be made available on OHME's webpage in the Hazmat Safety Homepage.

OHME will evaluate and assess industry best practices of packaging operations to enable its lessons learned experiences to promulgate regulatory and operational packaging program improvement. This includes the use of best practices in recommending regulatory and policy improvement.

OHME will continue its focus on high risk, high consequence packaging through collection and evaluation of test data from package manufacturers and testing programs. OHME will evaluate combination packaging and pressure vessels for performance in air transportation through continued surveillance and collection of test data and will establish performance testing benchmarks that is commensurate with safety.

Challenges

The accomplishment of OHME's packaging objectives is dependent on the ability to mitigate and manage challenges that threaten the effort. The following is a list of the more significant challenges:

- Resource limitations- including personnel, budget, and newly hired investigators with fractional knowledge-base.
- OHME's constrained authorization to collaborate on emerging operating practices and challenges in the packaging industry.

- Restrictions of oversight partners packaging expertise which necessitates intensive OHME sponsored training.
- Aligning differing perceptions and goals between government and regulated industry.
- Varying and opposing interpretations of program outcomes and measurements.
- Trust - the existing perception of government by the general public

Strategies

OHME will overcome the challenges it encounters by employing the techniques listed below.

Transparency - OHME will openly share its processes and procedures as-well-as its data with interested parties and the regulated public.

Building Capabilities – OHME will continue its intensive investigator training program to further develop and enhance the packaging expertise and skills of its own personnel.

Leveraging Resources – OHME will leverage its resources by taking a leadership role in investigator training and by encouraging multi-modal activities.

Setting Focus – OHME will utilize available data to evaluate activities by risk and consequence. It will prioritize its activities focusing on those posing the greatest risks and consequence.

Action Plan – OHME will develop an action plan and assemble national teams consisting of its highly qualified packaging staff. OHME will implement action plans which ensures organized guidance directed at achieving the desired goals.