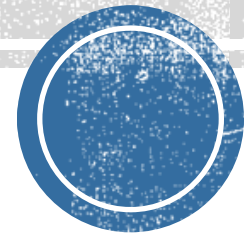




APA at Work for You

Hazmat Safety Consulting, LLC



Who is HSC?

- **President – Bob Richard**

- Former Associate Administrator for OHMS
- Former Chairman of the UN Subcommittee for the transport of DG

- **Vice President – Ryan Paquet**

- Former Director of Approvals and Permits for OHMS
- Former US delegate to the UN Subcommittee for the transport of DG

- **Senior Consultant – Mike Pagel**

- Former PHMSA Info Center manager

- **Associate Consultant – Paula Reavis**

- Professional trainer and expert in adult learning

- **Associate Consultant – Michael Roldan**

- Former USCG Hazmat Chief

- **Associate Consultant – Peg Carson**

- Former PHMSA Investigator

- **Associate Consultant – Barbara Lantry-Miller**

- DG and GHS professional for decades

- **Associate Consultant – Richard Tarr, PhD**

- Former PHMSA Chemist



2024 Accomplishments

- APA Standards Revision
- De Minimis Quantities of Explosives
- UN Subcommittee Observer Status
- Miscellaneous Support



APA Standard Revisions 87-1A & 87-1C

- **New Definitions**
- **Revised Chemical List**
- **New Devices**
- **Addresses Articles Pyro vs UN0336 “For Technical Purposes”**



De Minimis Quantities of Explosives

- Request for feedback to determine what small quantities or low concentrations of explosives might present a low enough risk to life property and the environment to justify a lower level of regulatory oversight.
- Comments are due on September 26th, but PHMSA will accept late comments from APA.
- The information will be used to define the focus of a research project investigating the risk of small and/or de minimis quantities of explosive substances



De Minimis Quantities of Explosives

- What small quantities or low concentrations of explosives are offered for transport that appear to present a low risk to life, property, and the environment?
 - Negligible severity—Could result in one or more of the following: injury or occupational illness not resulting in a lost work day, minimal environmental impact (air/water/solid waste pollutant emissions, inadvertent hazardous releases, or adverse change upon resources/ecosystems), or monetary loss less than \$100K.
 - Remote probability—Unlikely, but possible for an incident to occur in the life of the item.



De Minimis Quantities of Explosives

- What types of low-risk explosives do you transport?
- What is the composition of the explosives you transport?
- What types of packaging configurations?
- Average net explosive weight, inner package?
- Average net explosive weight, outer package?
- UN Numbers?
- How many packagings are in one average shipment?
- How many shipments per year?
- What mode do you use? Ground, Air, Vessel?



De Minimis Quantities of Explosives

- Where do you typically ship these to? Domestic or international? End user or other facility?
- Please list up to five examples of small quantities and/or low concentrations of explosives presenting more than a low risk to life, property, and the environment.
- What impact does waiting for PHMSA approval of your small quantities and/or dilute explosives have upon your facility, in your efforts to comply with the requirements of other regulatory agencies?
- What threshold quantity and/or concentration of explosives, if any, presents a low risk to life, property, and the environment, and should, in your opinion, be considered for exception from regulation by PHMSA?
- What is the technical basis for your opinion (*e.g.*, testing, experience, data, etc.)?
- Why, in your opinion, should a threshold quantity and/or concentration of explosives not be considered for exception from regulation by PHMSA?



UN Subcommittee Consultative Status

- In June 2024, The UN Subcommittee of Experts on the Transport of Dangerous Goods approved the request to grant the APA Consultative Status.
- APA members can now officially participate in discussions regarding the classification and transport of explosives, including participation in the Explosives Working Group (meets every June)
- The Netherlands and other European countries have been active in testing fireworks to compare the actual device against the UN default classification system for fireworks.



Miscellaneous Support

- Aerosols guidance and interpretations
- Lithium battery transport and updates
- Coordination with PHMSA and FMCSA
- Special Permit and Approval support and guidance



We are here for you!

Contact	Email	Area of Knowledge
Ryan Paquet	rpaquet@hazmatsafety.com	DG Regs and Navigating Bureaucracy
Dr. Richard Tarr	rdtarr@hazmatsafety.com	All things Fireworks and energetic
Bob Richard	brichard@hazmatsafety.com	DG Regs, Lithium Batteries and more
Mike Pagel	mpagel@hazmatsafety.com	DG Regs, Lithium Batteries and more
Michael Roldan	mroldan@hazmatsafety.com	Vessel shipping and USCG
Margaret Carson	mcarson@hazmatsafety.com	Hazmat Audits
Paula Reavis	preavis@hazmatsafety.com	Adult Learning
Barbara Lantry-Miller	blantrymiller@hazmatsafety.com	DG and GHS Operations

