



Ryan Paquet, PG
Vice President
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Who is HSC?

HELPING COMPANIES LARGE AND SMALL, BRING THEIR INNOVATIONS TO THE GLOBAL MARKET SAFELY.

HazMat Safety Consulting specializes in applying decades of domestic and international regulatory experience, bringing innovations to the market, and helping companies simplify the complex world of Dangerous Goods compliance and logistics.

HSC currently manages the Medical Device Transport Council, representing medical device manufacturers in domestic and international regulatory actions. This provides access to international forums for HSC staff.

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
 - ▶ Co-chair of the Interested Parties Group
- ▶ **Senior Consultant – Mike Pagel**
 - ▶ Former PHMSA Info Center manager
 - ▶ Member of NFPA 855 – Energy storage facilities
- ▶ **Associate Consultant – Dr. Richard Tarr**
 - ▶ Former PHMSA chemist
 - ▶ Fireworks guru
- ▶ **Associate Consultant – Paula Reavis**
 - ▶ Professional trainer and expert in adult learning

Standards Committee Support

- ▶ HSC has been providing technical support to the APA Standards Committee throughout the drafting process
- ▶ Dr. Tarr has been supporting and coordinating review and responses with PHMSA
- ▶ This includes reviewing test reports and incorporating the results into the affected standards

Articles Pyrotechnic Importing – SP21223

- ▶ Drafted and submitted a special permit application
- ▶ Collaborated with PHMSA International Standards, Special Permits and the DOT Secretary's office
- ▶ Met with ATF to describe our SP to ensure that it would be clear for their inspection personnel

Articles Pyrotechnic Importing – SP21223

- ▶ Manufacturers make UN0431 in accordance with DOT EX Approval
- ▶ Shipping Boxes are marked and labeled as:
 - ▶ UN0335, Fireworks, 1.3G
- ▶ Shipping Container is placarded as 1.3G
- ▶ Once container has reached US destination, each box must be remarked and labeled in accordance with appropriate EX Approval
- ▶ SP21223 allows Party Status
- ▶ 9 Current holders

Flame Cannister Special Permit Application

- ▶ Salamander or G-Flame fuel receptacles
- ▶ After show, partially empty cans are fully regulated as Div 2.1
- ▶ Aerosols intended to be recycled or disposed can be transported as LTD QTY, under §173.306(k)
- ▶ **SP application submitted** (8/22/2023) that authorizes the same treatment for partially empty flame cannisters

UN Discussion

HSC Attends each biennial UN SCOETDG meeting in Geneva Switzerland

- ▶ The Netherlands continues Firework discussions based upon the May 2000 warehouse fire in Enschede.
- ▶ Twice per year, they test Div 1.4 fireworks by performing 6(c) test.
- ▶ They claim a failure rate of 30-40%
- ▶ This topic was referred to the EWG and will be further discussed in future sessions, including:
 - ▶ A review of the UN default table given the new and novel compositions being encountered on the fireworks market
 - ▶ The clarification in description for the 6(c) test regarding the arrangement of packages, witness panels and the 0.15 m³ requirement
 - ▶ Ideas for building confidence in the technical documentation

Ongoing and Future Projects

- ▶ **ELDT Program** – Coordinated productive conversations with FMCSA
- ▶ Will support APA in providing comments to FMCSA on **Hours of Service Exemption** – OOS inspections
- ▶ **FCA Petition For Rulemaking**
 - ▶ APA is considering to submit a petition for rulemaking to allow FCA review and certification for products under 87-1A, B & C
 - ▶ FCA's have certified 11,000 firework designs (UN0336, 1.4G only)
 - ▶ Nominal fee paid to the FCA
 - ▶ Can be processed within a few days
- ▶ Provide **Hazmat Training Class** and continually update material.

Thank you!



Reach Out Anytime!
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