

Supporting Statement A
Federal Aviation Administration
Hazardous Materials Program Requirements (Previously Hazardous Materials
Training Requirements)
OMB Control # 2120-0705

Changes in this renewal include:

- Adjustment in respondent estimates (decrease for Part 121 and 135 certificate holders and increase for Part 145 repair stations) based on current data;
- Adjustment in the annual burden estimate (increase) based on increased aircraft operation complexity and interaction between the respondents and the FAA; and
- Adjustment to the title to more appropriately summarize the collection.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Title 49 United States Code (USC) § 44702 empowers the Secretary of Transportation to issue air carrier operating certificates and to establish minimum safety standards for the operation of the air carrier to whom such certificates are issued. Under this authority, the Federal Aviation Administration (FAA) prescribes the terms, conditions, and limitations necessary to ensure safety in air transportation. See 14 Code of Federal Regulations (14 CFR) Parts 121, 135, and 145.

This information collection was first established in the final rule, “Hazardous Materials Training Requirements” (70 FR 58796; Oct. 7, 2005), to cover hazardous materials (hazmat) program requirements for Part 121 and 135 certificate holders (CH) and Part 145 repair stations.

14 CFR requires air operators engaging in common carriage air transportation (air carriers) to have a certificate and operations specifications that prescribe the authorizations, limitations, and procedures under which each kind of operation must be conducted. Specifically, § 119.49(a)(13) requires that a CH’s operations specifications must include either an authorization permitting the CH to handle and transport hazmat (will-carry CH) or a prohibition against handling and transporting hazmat (will-not-carry CH).

The required operations specification ensures that hazmat packages are only accepted, handled, and transported by air carriers who are appropriately trained and have policies that support safety in the National Airspace System (NAS). Improper handling and transport of hazmat can have deadly consequences, as demonstrated by the May 1996 crash of ValuJet Flight 592. Therefore, the hazmat program requirements covered in this information collection help support safety in the NAS.

Specifically, and depending on the type of operator, this information collection includes:

- An accepted hazmat manual for Part 121 and 135 CHs;
- An approved hazmat training program for Part 121 and 135 CHs;

- Part 145 repair station hazmat training; and
- Notification for Part 145 repair stations.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

As mentioned above, this information collection covers different hazmat program requirements as described below.

Hazmat Manual and Training Program

Part 121 and 135 CHs are required to have procedures and information (often referred to as a hazmat manual) that assist each crewmember and person performing or directly supervising the following job functions involving items for transport on an aircraft:

- Acceptance;
- Rejection;
- Handling;
- Storage incidental to movement;
- Packaging of company materials (COMAT); or
- Loading.

See 14 CFR 121.135(b)(25)(i) and 135.23(p)(1).

The hazmat manual requirements apply regardless of whether an air carrier transports hazmat, although the extent of the requirement varies depending on whether they transport hazmat. All hazmat manuals must include procedures and information sufficient to assist personnel meeting one of the above job functions in identifying packages marked or labeled as containing hazmat or that show signs of being an undeclared hazmat package. These procedures and information must include:

- Procedures for rejecting packages that do not conform to the Hazardous Materials Regulations (HMR; 49 CFR Parts 171 through 180) or that appear to contain undeclared hazmat;
- Procedures for complying with the hazmat incident reporting requirements of 49 CFR 171.15 and 171.16 and discrepancy reporting requirements of 49 CFR 175.31; and
- Whether they are authorized as a will-carry or will-not-carry CH.

In addition, will-carry CHs are also required to include procedures and information to ensure that:

- Packages containing hazmat are properly offered and accepted in compliance with the HMR;
- Packages containing hazmat are properly handled, stored, packaged, loaded, and carried on board an aircraft in compliance with the HMR;
- The requirements for Notice to the Pilot in Command (49 CFR 175.33) are complied with; and
- Aircraft replacement parts, consumable materials, or other items regulated by the HMR are properly handled, packaged, and transported.

See 14 CFR 121.135(b)(25)(ii) and 135.23(p)(2).

The hazmat manual requirements may be included in one manual or within multiple parts of the CH's manual, so long as there are appropriate interfaces to hazmat requirements. Additionally, the hazmat manual may be in electronic form and is accepted by the FAA during the certification process.

In addition to the accepted hazmat manual, Part 121 and 135 CHs must have an approved hazmat training program. The hazmat training program must provide training for each crewmember and person performing or directly supervising the previously mentioned job functions. The hazmat training program must:

- Satisfy the requirements of 14 CFR Part 121, Appendix O;
- Ensure that each person performing or directly supervising any of the previously mentioned job functions is trained to comply with all applicable parts of the HMR and the requirements of 14 CFR Part 121, Subpart Z or Part 135, Subpart K, as applicable; and
- Enables the trained person to recognize items that contain, or may contain, hazardous materials regulated by the HMR.

The training must be provided to appropriate personnel initially and every 24 months. See 14 CFR Part 121, Subpart Z and Part 135, Subpart K.

The FAA issued Advisory Circular (AC) 121-40, *14 CFR Part 121 and Part 135 Dangerous Goods Transportation Operations*,¹ to assist applicants and CHs in developing the hazmat manual and training program.

Hazmat manuals and training programs are submitted to the FAA during initial certification. Additionally, hazmat manuals and training programs may be submitted when revised following certification. The FAA uses the certification and modification process to determine CH compliance with the regulations and whether they have established safe operating procedures.

¹ AC 121-40 is available at: https://www.faa.gov/regulations_policies/advisory_circulars/index.cfm/go/document.information/documentid/1032386.

Hazmat Training Records & Recordkeeping

14 CFR 121.1007 and 135.507 requires Part 121 and 135 CHs to maintain a record of initial and recurrent training for all personnel covered in the applicable hazmat training program requirements. This record verifies the names of employees who have taken training, the date of training, and the training content. The training record is provided to the FAA upon request to verify compliance.

Part 145 Repair Station Training

14 CFR 145.53 requires Part 145 repair stations to certify that all hazmat employees have been trained in accordance with the HMR. This certification must be provided to the FAA before a Part 145 certificate or change of rating is issued. This ensures that the Part 145 repair station is in compliance with the regulations.

Notification

The FAA uses the notification requirements detailed below to determine Part 145 repair stations compliance with the HMR. Therefore, these requirements only apply to Part 145 repair stations subject to the HMR. The notification requirements require:

- Part 121 and 135 CHs to ensure that each Part 145 repair station performing work on their behalf is notified in writing and is aware of the CH's policies and operations specification permitting or prohibiting against the acceptance, rejection, handling, storage incidental to transport, and carriage of hazmat (§ 121.905(e) and 135.505(e));
- Part 145 repair stations notified by their Part 121 or 135 CH to verify receipt of the notification (§ 145.206(a)); and
- Part 145 repair stations to notify their employees, contractors, or subcontractors that handle or replace aircraft components or other items regulated by the HMR of the will-carry or will-not-carry status of the CHs for which the repair station performs work for or on behalf of (§ 145.206(b)).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

All information collected under this OMB Control Number can be prepared, stored, and submitted electronically. The FAA has encouraged using automation in compliance with the Government Paperwork Elimination Act (GPEA), including that:

- Part 121 and 135 CHs can develop and submit their hazmat manuals and training programs electronically;
- Training records can be developed and stored electronically (§§ 121.1007 and 135.507);

- Written notification requirements in §§ 121.905 and 135.505 can be complied with electronically (e.g., regular mail, overnight mail, fax, email); and
- The repair station employee notification requirement in §145.206 can be delivered electronically.

Lastly, the FAA-issued training records, authorizations, and operations specifications are issued electronically to further support the use of electronic techniques.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The FAA has not identified any duplication of the information collected in this OMB Control Number. The following details some items that were considered:

- The information collected is only available from the applicant or CH, as the information is not available from any other source;
- Although Part 121 and 135 CH personnel may receive training in accordance with 49 CFR Part 172, Subpart H,² this collection is still necessary because not all personnel covered by this collection are subject to 49 CFR Part 172, Subpart H, and duplication does not exist for these personnel. Additionally, those personnel trained under 49 CFR may use that training to meet 14 CFR hazmat training program requirements; and
- The repair station notification requirements are not duplicated as they are not required elsewhere. When first required in the 2005 rulemaking, the notification requirement was new as it was a part of a National Transportation Safety Board (NTSB) safety recommendation.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Under the Regulatory Flexibility Act, 5 U.S.C. 605(b), the FAA certifies that this information collection will not have a significant economic impact on substantial number of small businesses.

Applicants for operating certificates, whether small or large businesses, are guided through the administrative requirements of Parts 121, 135, and 145 by FAA personnel assigned certificate responsibilities to help reduce the burdens on small businesses.

² Hazmat training is required in accordance with 49 CFR 172.704(d) and International Civil Aviation organization (ICAO) Technical Instructions (TI) 1;4.2.4, for any personnel who is a "hazmat employee" (see 49 CFR 171.8).

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The FAA has minimized the requested information as much as possible without impacting safety. Part 121 and 135 CHs obtain approval or acceptance, as appropriate, of their hazmat manual and training program during initial certification and modification, when appropriate. There is no requirement for these CHs to provide periodic updates. Part 145 repair stations must fulfill requirements before the FAA issues a certificate and not at the time of application. The frequency of information collection depends on the applicant's business plan and the need for CHs who have obtained air carrier certification to undergo recertification if they plan to conduct new operations. The applicant who requests certification benefits, for the most part, determines the frequency of information.

Without this information collection, the FAA would anticipate an increase in undeclared and improperly declared hazmat shipments, which would increase incidents. Enforceable hazmat training standards for the hazmat training program reduce the potential for undeclared and improperly prepared hazmat shipments from being transported by aircraft.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has*

instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A 60-day Federal Register Notice published on June 17, 2025 (90 FR 25742), solicited public comment. In response to the 60-day notice, the FAA received two comments.

The Aviation Suppliers Association³ commented that the burden estimate for 2 hours per repair station was too small and recommended increasing the hours to 40 hours for new hazmat manuals and 8 hours for revised manuals. In addition, they point to additional training recordkeeping burden in 49 CFR 172.704, not accounted for in this collection.

FAA Response: The FAA agrees that the development of repair stations manuals would take more than 2 hours; however, as identified, this collection only covers the burden associated with hazmat training records certification and notification for repair stations (see 14 CFR 145.53 and 145.206). In addition, the 49 CFR 172.704 training requirement for hazmat employees as well as other information collected under the HMR are covered by the Pipeline and Hazardous Materials Safety Administration (PHMSA); see 49 CFR 171.6. Therefore, the FAA maintains that 2 hours is a reasonable estimate for the Part 145 Repair Station burden.

The Council of Safety Transportation of Hazardous Articles (COSTHA)⁴ commented on several topics related to this information collection. Specifically, COSTHA:

- Highlighted areas where the 60-day notice implied there was a change to the information collected under this collection;
- Opposed the proposed change to the title of this information collection;
- Indicated that the FAA has used this collection for broader information collection, such as for "Commercial Air Tour Operator Reports;"
- Requested standardization of internal FAA review processes of the collected information; and
- Requested more details for the burden estimate.

³ <https://www.regulations.gov/comment/FAA-2025-0493-0002>.

⁴ <https://www.regulations.gov/comment/FAA-2025-0493-0003>.

FAA Response: The FAA appreciates COSTHA's comments highlighting some of the potential confusion in the 60-day notice. However, the FAA asserts that any confusion was inadvertent and does not change the scope of this information collection. As identified, this collection only covers the requirements originally promulgated in the October 7, 2025, final rule. Both the 60-day notice and this notice are only intended to request an extension to collect the required information—and not change what kind of information is collected.

The proposed editorial change to the title of this information collection to "Hazardous Materials Program Requirements" continues to be intended to better reflect the information collected instead of just one portion of this collection. By editorially changing the title to "Hazardous Materials Program Requirements," the FAA only intends to clarify, based on title alone, that this collection also covers other various 14 CFR hazmat requirements. The FAA disagrees that changing the title will lead to future expansion of the scope of this collection. Should the FAA choose to expand the required information collected, the FAA will issue appropriate notice and comment on the change.

In response to COSTHA's assertion that the FAA has used this collection for other types of collection, such as "Commercial Air Tour Operator Reports," the FAA disagrees. This type of information is currently covered by OMB Control Number 2120-0750 and not this collection (2120-0705). The FAA believes that there may have been a slight oversight in numerical differences and reiterates that this collection is only for hazmat manual and training program requirements.

The FAA also appreciates COSTHA's input and suggestions for ways that the FAA can improve our internal training program review process. While these comments are outside the scope of this notice, the FAA has noted these suggestions and will consider ways to better streamline the review process.

Lastly, the FAA has provided full accounting for this information collection in this supporting statement and urges the public to review Question 12 for a full accounting of the burden associated with this collection.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

Assurance of confidentiality is not provided to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.**

Based on the FAA's data, the estimated number of operators subject to this information collection is captured in the following table:

Operator Type	Total Operators
Part 121 CHs	62
Part 135 CHs	1,844
Part 145 Repair Stations	4,989

Hazmat Manual and Training Program

The hazmat manual and training program are developed during the certification process for a Part 121 and 135 CH and revised, when appropriate, after a CH makes operational updates or other regulatory updates require revisions. The FAA estimates that, on average, annual hazmat manual and training program development and updates require 5 hours for a Part 121 CH and 3 hours for a Part 135 CH. The FAA estimates the hourly wage costs, including benefits, are \$174.01 per hour for Part 121 CHs⁵ and \$88.66 per hour for Part 135 CHs.⁶

Table 1 – Hazmat Manual and Training Program Burden

⁵ BLS. *Occupational Employment and Wages*, May 2024. Transportation and Material Moving Occupations; Airline Pilots, Copilots, and Flight Engineers NAICS 53-2011. <https://data.bls.gov/oesprofile/>. Hourly wage is calculated as \$280,570/2,080 hours = \$134.89. For private industry, the FAA estimates 29% for benefits. Therefore, to account for benefits: \$134.89*1.29 = \$174.01.

⁶ BLS. *Occupational Employment and Wages*, May 2024. Transportation and Material Moving Occupations; Commercial Pilots NAICS Code 53-2012. <https://data.bls.gov/oesprofile/>. Hourly wage is calculated as \$142,960/2,080 hours = \$68.73. For private industry, the FAA estimates 29% for benefits. Therefore, to account for benefits: \$68.73*1.29 = \$88.66.

Operator Type	Total Operators	Average Response per Operator	Total Responses	Average Annual Burden Hours	Annual Burden Hours	Hourly Wage	Annual Cost
Part 121	62	1	62	5	310	\$174.01	\$53,942
Part 135	1,844	1	1,844	3	5,532	\$88.66	\$490,482

Hazmat Training Records & Recordkeeping

The FAA estimates that there is an associated burden for creating and updating training records after each employee takes hazmat training (initially and every 24 months). The FAA estimates that, on average, there are an estimated 285,729 annual responses for a Part 121 CH and 116,264 annual responses for a Part 135 CH. The FAA estimates it takes an office clerk 5 minutes to create or update each training record. The hourly wage of the office clerk, including benefits, is estimated to be \$28.20.⁷

Table 2 – Hazmat Training Records & Recordkeeping Burden

Operator Type	Total Operators	Average Employees per Operator	Total Responses	Average Annual Burden Hours	Annual Burden Hours	Hourly Wage	Annual Cost
Part 121	62	4,608.54	285,729	0.08	22,858	\$28.20	\$644,582
Part 135	1,844	63.05	116,264	0.08	9,301	\$28.20	\$262,283

Part 145 Repair Station Training

The FAA estimates that 6% of Part 145 Repair Stations must certify that all hazmat employees have been trained in accordance with the HMR before they receive certification or change of rating. The FAA estimates that it takes an office clerk 2 hours to certify this training and submit the documentation to the FAA. The hourly wage of the personnel verifying this requirement, including benefits, is estimated to be \$28.20.⁸

Table 3 – Part 145 Repair Station Training Burden

Operator Type	Total Operators	Average Response per Operator	Total Responses	Average Annual Burden Hours	Annual Burden Hours	Hourly Wage	Annual Cost
Part 145 Repair Station	299	1	299	2	598	\$28.20	\$16,863

⁷ BLS. *Occupational Employment and Wages*, May 2024. Office and Administrative Support Occupations. Office Clerks NAICS Code 43-9061. <https://data.bls.gov/oesprofile/>. Mean hourly wage is estimated at \$21.86. For private industry, the FAA estimates 29% for benefits. Therefore, to account for benefits: \$21.86*1.29 = \$28.20.

⁸ Ibid.

Notification

The FAA estimates that it takes one hour for a Part 121 CH and 30 minutes for a Part 135 CH to prepare and provide notification to Part 145 Repair Stations. Furthermore, the FAA estimates it takes less than 10 minutes for Part 145 repair stations to notify their employees of appropriate Part 121 or 135 CH will or will-not-carry status. The FAA estimates an office clerk will make this notification with an hourly wage, including benefits, of \$28.20.⁹

Table 4 – Notification Burden

Operator Type	Total Operators	Notification per Operator	Total Responses	Average Annual Burden Hours	Annual Burden Hours	Hourly Wage	Annual Cost
Part 121	62	1.84	114	1	114	\$28.20	\$3,215
Part 135	1,844	0.87	1,604	0.5	802	\$28.20	\$22,616
Part 145 Repair Station	4,989	1	4,989	0.16	798	\$28.20	\$22,503

Summary of Annual Burden

The total burdens captured in this information collection are detailed in the following table:

Table 5 – Summary of Burden

Operator Type	Total Operators	Sum of Annual Burden Hours	Sum of Annual Cost
Part 121 CH	62	23,282	\$701,739
Part 135 CH	1,844	15,635	\$775,381
Part 145 Repair Station	4,989	1,396	\$39,366

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

See Question 12.

⁹ Ibid.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The FAA estimates that costs to the Federal government are attributed to the hazmat manual and training program review. The FAA estimates it takes 3 hours to review, on average, these documents. The review is conducted by an H-band employee whose hourly wage, including benefits, is \$69.53.¹⁰ Annually, the FAA estimates 1,997 submissions must be reviewed, for a total cost to the government of 1,997 submissions x 3 hours x \$69.53 = \$416,547.92.

Table 6 – Federal Costs

Number of Annual Reviews	Hours per Submission	Annual Hours	Hourly Wage	Annual Cost
1,997	3	5,991	\$69.53	\$416,547.92

15. Explain the reasons for any program changes or adjustments.

For this information collection, the FAA has adjusted the estimates based on the current number of active CHs and repair stations. Specifically, the FAA estimates a decrease in active Part 121 and 135 CHs and an increase in active Part 145 Repair Stations. Additionally, the FAA has adjusted the average annual burden for Part 121 and 135 hazmat manual and training program as well as Part 145 Repair Station training. Specifically, the FAA estimates an increase in estimated burden to Part 121 and 135 CHs associated with the hazmat manual and training program to account for the increased complexity in aircraft operations and increased interaction between CHs and the FAA. Additionally, the FAA estimates an increase in Part 145 Repair Stations training burden to account for more realistic estimates and complexity in Part 121, 135, and 145 hazmat training programs. Lastly, the FAA has editorially revised the collection title to more appropriately summarize the collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There is no publication plan.

¹⁰ FAA. *Core Compensation Salary Table*, January 12, 2025. Average H-Band Salary Washington locality. https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx. Mean annual rate is estimated at \$108,737; over 2,080 hours per year, hourly wage estimated at \$52.28. For government, the FAA estimates 33% for benefits. Therefore, to account for benefits, hourly cost: \$52.28*1.33=\$69.53.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

No such approval is being sought.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions.