

Valdosta State University

Hazardous Materials Shipping and Transportation

Created: October, 2008

Revised:

I. Overview

Some University employees occasionally need to ship packages of hazardous materials through the mail or overnight service. If these employees are not trained or do not properly follow the shipping regulations as described in this policy, their actions may result in accidents, injuries, regulatory violations, fines, loss of grant funding to the University, criminal penalties, and/or imprisonment.

II. Policy Statement

It is the policy of Valdosta State University to ship and transport hazardous materials (sometimes referred to as “dangerous goods”) safely and in compliance with the rules and regulations of the US Department of Transportation (US DOT), the International Air Transportation Association (IATA), and other regulatory agencies.

Only properly trained University employees or students are allowed to ship or transport hazardous materials. Students are authorized to ship or transport hazardous materials only with proper training, and only with the knowledge and approval of a University employee supervisor (such as a Principal Investigator or office manager) who has successfully completed Hazardous Materials Transportation awareness level training or higher.

III. Applicability

- Faculty and staff initiating or authorizing the shipment of hazardous materials or otherwise having a role in the shipping of hazardous materials.
- Faculty and staff who transport hazardous materials or handle hazardous materials incidental to transportation (such as storeroom personnel).

IV. Policy Administration

This policy is administered by the following departments and/or personnel. Full responsibilities are discussed below.

Environmental & Occupational Safety
Campus Mail Services
Principal Investigators and Supervisors
Deans, Directors, and Department Chairs

V. Responsibilities

Environmental & Occupational Safety (E&OS):

- Communicates the existence and core components of this policy to all campus units.
- Establishes and communicates appropriate levels of training for hazardous materials employees.
- Provides or makes available approved hazardous materials training.
- Provides technical guidance upon request to campus units in the shipment of hazardous materials.
- Maintains and updates a campus hazardous materials shipping web site.
- Maintains a list of persons who have completed hazardous materials shipment training.
- Conducts periodic audits for hazardous materials shipping compliance.
- Investigates hazardous materials shipping discrepancies and carrier-rejected shipments.
- Notifies responsible parties of any hazardous materials shipping discrepancies or regulatory actions affecting their operations, and shares “lessons learned” with other units as applicable.
- Reports deficiencies to the appropriate regulatory agency as required.

Campus Mail Services:

- Provides pickup services for hazardous materials packages intended for shipment by Campus Mail Services by appropriately trained personnel.
- Ensures hazardous materials packages have been properly packaged and identified.
- Ensures all shipping documents are completed properly.
- Reconciles shipper information with list of trained persons obtained from Environmental & Occupational Safety.
- Consults with Environmental & Occupational Safety on areas of question or concern.

Principal Investigators and Supervisors:

- Ensure that all “hazardous materials employees” (see glossary) obtain and maintain the appropriate level of documented training for their duties.
- Fund the costs of safe and compliant hazardous materials shipments.
- Ensure that all hazardous materials are identified, classified, packaged, and shipped safely and in accordance with applicable shipping regulations.
- Request assistance from E&OS if department personnel are not trained.

Deans, Directors, and Department Chairs:

- Develop and enforce internal procedures to comply with this policy, including procedures to maintain training, certification, and shipping records.
- Support E&OS or regulatory agency audits and investigations, and pay associated fines and penalties for any departmental compliance deficiencies.

VI. Procedures

Training and Certification

All Valdosta State University hazardous materials employees (see definition in glossary) must complete E&OS-approved training every three years appropriate to their level of responsibility. Training topics include, but are not limited to: general awareness, function specific, personnel safety, and security awareness. Security Awareness training is required for persons shipping or transporting certain high risk hazardous materials (see glossary for examples of high risk hazardous materials).

E&OS provides a list of approved hazardous materials training vendors. Other vendors may not be used unless E&OS reviews and approves the training content.

Hazardous materials employees shall provide certificates of completion of initial and refresher hazardous material training to E&OS and maintain documentation of successful completion.

Supervisors (including Principal Investigators) who oversee operations involving the shipment and transportation of packages containing hazardous materials are to ensure that only properly trained individuals handle and ship hazardous materials.

Package Shipment

Hazardous materials employees must determine if the material they are shipping is a hazardous material and must identify it to E&OS and/or Campus Mail Services. Once a determination is made, the employee must package the material in conformance with DOT and IATA regulations, complete the appropriate shipping documents and request a pickup of the material by Campus Mail, providing 24-hour notice of the request.

Campus Mail Services will inspect the packaging material and associated documents upon pickup and will ensure the shipment is completed in accordance with Federal regulations.

Environmental & Occupational Safety serves as a resource for all hazardous materials employees to assist in determining if the material is hazardous and provide advice on proper packaging.

Document Retention

Departments that ship hazardous materials must establish and maintain files which include copies of all shipping papers and training records. Hazardous materials shipping papers must be retained for at least 24 months after the date of shipment.

Supervisors are required to maintain hazardous materials employees' training records for three years or for 90 days after employment ends. Supervisors are required to maintain a list of hazardous materials employees and provide this list to E&OS or government agency personnel upon request.

Separation and Segregation

Departments involved in the shipping and transportation of regulated hazardous materials must ensure proper storage of these materials.

Self Transport Via Ground

The movement of hazardous materials within the contiguous Valdosta State University campus is not regulated per US DOT as a hazardous materials shipment, although training and safety precautions are still required. Transporting hazardous materials on public roads is prohibited

unless it is in accordance with US DOT “Materials of Trade” regulations (see glossary and contact E&OS for compliance assistance).

International Shipments

International shipments, whether imported or exported, may require permits and licensing authority. Shipping certain biological substances, for example, requires approval from the Centers for Disease Control and Prevention. E&OS must be provided with at least 20 working days’ notice to assist with international shipments.

Additional Requirements Regarding Specific Hazardous Materials

Contact the E&OS Office for assistance with these hazardous materials shipments:

- Infectious Substances. Shipments containing an infectious substance are strictly regulated. Exempt biological shipments via air may require specific packaging requirements as well.
- Dry Ice. Shipments containing dry ice are regulated when transported by air or overwater. Quantity limits apply and vented packaging is required.

Compliance Measurements and Goals

Successful compliance with this policy is measured by periodic E&OS audits. The goal is 100% compliance of all audited hazardous materials shipments.

VII. Glossary

Dangerous goods: Interchangeable with the term “hazardous materials” and mainly used in connection with air shipments of regulated materials.

Hazardous Materials: Substances or materials that the Secretary of Transportation has determined to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce. Examples of hazardous materials used on campus include laboratory reagents, pool chemicals, lubricating oils, paint, batteries, infectious substances, dry ice, and hazardous wastes.

Hazardous Materials Employee: A person who, in the course of full time, part time, or temporary employment, directly affects hazardous materials transportation safety. A person who loads, unloads, handles, prepares (identifies, classifies hazardous materials, packages, marks, labels, or documents) hazardous materials packages, including the preparation of shipping papers, tenders hazardous materials into commerce, or who otherwise transports hazardous materials shipments.

Hazardous Materials Employer: An employer (including a state agency) who employs or uses at least one hazardous materials employee on a full time, part time, or temporary basis, who transports hazardous materials in commerce; causes hazardous materials to be transported in commerce; or designs, manufactures, fabricates, inspects, marks, maintains, reconditions, repairs, or tests a package, container, or packaging component that is represented, marked, certified, or sold by that person as qualified for use in transporting hazardous materials in commerce.

Hazardous Materials Regulations: Department of Transportation regulations governing the transportation of hazardous materials *in commerce* (within the jurisdiction of the United States, for shipments to, from, and through the United States) are found in 49 CFR parts 171 through

180. The movement of regulated materials within contiguous University property does not constitute a shipment in commerce.

Hazardous Materials Shipper: An individual, corporation, company association, firm, partnership, society, joint stock company, or a government, state agency, tribe, or authority of a government or tribe that offers a hazardous material for transportation in commerce or transports a hazardous material to support a commercial enterprise, other than the U.S. Postal Service. Hazardous material shippers identify, classify, package, mark, label, document, and/or tender a hazardous material into transportation.

High Risk Hazardous Materials:

- Radioactive material;
- Explosives;
- Materials poisonous by inhalation;
- Bulk hazardous materials shipments;
- Select agents or toxins regulated by the Centers for Disease Control & Prevention or the US Department of Agriculture; or
- A quantity of hazardous materials that requires placarding.

International Air Transportation Association (IATA): This organization works closely with governments in the development of regulations governing air shipment of hazardous materials.

Materials of Trade: Hazardous materials, other than hazardous waste, that are carried on a motor vehicle to directly support a principal business. Examples include landscaping, pest control, painting, plumbing, and welding. Employees handling materials of trade must have general knowledge of relevant regulations, quantity limitations, and packaging and labeling requirements.

Regulated Materials: Hazardous materials that pose an unreasonable risk when transported in commerce. Also known as materials "Regulated for Transportation."

Shipping: The process whereby a hazardous materials employee identifies, classifies, packages, marks, labels, documents, and tenders the hazardous materials shipment to a transport carrier.

Transportation: The movement of property, including the loading, unloading, or storage incidental to that movement.

VIII. Related Documents

Code of Federal Regulations – (CFR) Title 49, Transportation

Code of Federal Regulations – (CFR) Title 40, Protection of the Environment

Code of Federal Regulations – (CFR) Title 10, NRC Regulations

International Civil Aviation Organization (ICAO) Technical Instructions/

International Air Transport Association (IATA), Dangerous Goods Regulations (DGR)

DOT Emergency Response Guidebook