

# OP 79.09: TRANSPORTATION OF HAZARDOUS MATERIALS OR DANGEROUS GOODS

# **PURPOSE**

The purpose of this policy is to ensure that Mississippi State University is compliant with domestic and international regulations applicable to the commercial transportation of hazardous materials (domestic) or dangerous goods (international).

## **DEFINITIONS**

*Hazardous material* means a substance or material that, as determined by the United States Department of Transportation (USDOT), is capable of posing an unreasonable risk to health, safety, and property when transported in commerce. The term *hazardous material* or *hazmat* is used only when referring to domestic transportation; i.e., air, water, or ground (road or rail) within the U.S. or between the U.S. and Canada or the U.S. and Mexico (49 CFR Parts 100 – 185).

Dangerous goods are articles or substances which are capable of posing a risk to health, safety, property or the environment when transported by air, ground, or water. The term dangerous goods or DG is used when referring to international transportation.

### **POLICY**

Only MSU employees knowledgeable and trained in hazardous materials or dangerous goods transportation may offer hazardous materials or dangerous goods for commercial transportation. Most commercial carriers will not accept hazardous materials or dangerous goods for transportation without proof of required training. The Environmental Health & Safety Office (EH&S) at MSU employs individuals with the required training. Therefore, any commercial shipment of hazardous materials or dangerous goods by any MSU department or unit must be coordinated through the Environmental Health & Safety Office.

#### **PROCEDURE**

#### General Information

Transportation of hazardous materials in a motor vehicle, aircraft, or vessel operated by a Federal, state, or local government employee solely for non-commercial Federal, state, or local government purposes is not subject to the requirements of the USDOT hazardous material regulations (49CFR171.1(d)(5)). Examples of activities where hazardous materials are transported by MSU employees but are not subject to USDOT regulations include:

- Transport of chemicals, fertilizers, pesticides, etc. to and from main campus to off-campus MSU facility and between off-campus facilities;
- Transport of chemicals, fertilizers, pesticides between facilities of the main campus; and
- Transport of chemicals, fertilizers, pesticides from point-of-sale (e.g., Co-Op or farm supply store) to main campus or off-campus facility.

Hazardous materials or dangerous goods shipped by common carrier (e.g., DHL, FEDEX, UPS, USPS, freight line) from MSU may be subject to USDOT and/or international regulation. Only individuals knowledgeable and trained in these regulations may offer such material for transportation.

The USDOT regulations are utilized when shipping domestically by ground, while dangerous good regulations are utilized for international transportation. Additionally, USDOT authorizes domestic shipments of hazardous materials to follow international standards in lieu of 49 CFR for the transport by aircraft or vessel (49 CFR 171, Subpart C).

Specific international dangerous goods regulations by mode of transportation include:

- 1. Ground UN Model Regulations.
- 2. Air Regulations for the transportation of DG by air are given in the International Air Transport Association (IATA) Dangerous Goods Regulations. Note that air shippers in the United States (e.g., FEDEX and UPS) utilize IATA for both international <u>and</u> domestic shipments.
- 3. Water Regulations for the transportation of DG by vessel are given in the International Maritime Organization (IMO) International Maritime Dangerous Goods (IMDG) Code.

#### Shipping

The following are some common examples of hazardous materials shipped from MSU via commercial carrier that may be subject to regulation:

- Samples (chemical, pesticide, biological material) to testing laboratories;
- Samples (chemical, pesticide, biological material) to other colleges, universities, laboratories, etc.:
- Biological specimens preserved in a chemical agent such as formalin or ethyl alcohol;
- Biological materials and/or specimens shipped on dry ice; and
- Chemicals or pesticides returned to supplier and/or manufacturer.

<u>Transportation of radioactive materials by any means, commercial or non-commercial, may not be carried out without prior authorization of the MSU Radiation Safety Officer.</u>

Any MSU unit needing to ship hazardous materials or dangerous goods via commercial carrier must contact EH&S at (662) 325-3294 <u>prior</u> to offering the material to the commercial carrier. EH&S will need the following minimum information in order to process the material for transportation:

- Description of the material (chemical, pesticide, gas, biological material, etc.);
- Quantity;
- Size and type (glass, plastic, etc.) of container in which the material is to be shipped;
- Name, address and phone number of the individual offering the material for transportation; and
- Name, address and phone number of the individual to which the material is being shipped.

Depending upon the classification of the material, additional information may be requested by EH&S.

Upon receipt of the required information, EH&S will ensure the material is properly classified, marked, labeled, and packaged for transportation. EH&S will offer the completed package to the commercial carrier for transportation ensuring that all shipping documentation is properly completed. Shipping costs levied by the carrier will be the responsibility of the department/unit. EH&S maintains a small inventory of specialty packaging materials at no cost to the department/unit. However, if packaging is required that EH&S does not have in its inventory, the department/unit will be responsible for the cost of this packaging.

#### **Training**

MSU employees offering a hazardous materials or dangerous goods for transportation via commercial carrier must receive initial training in ALL requirements for classifying, marking, labeling, and packaging the material, as well as documentation requirements. Refresher training for domestic shipments (USDOT) is required every three years and, for international shipments, every two years. No MSU employee may offer hazardous materials or dangerous goods for commercial transportation without this required training. EH&S is staffed with individuals possessing this required training.

Though not offering a hazardous material for transportation, other MSU employees may be required to undergo training specific to their job function. Employees responsible for receiving hazardous materials from a commercial carrier must receive general awareness, function specific, and security training. Examples include employees with the following units:

- MSU Receiving and Property Control;
- Facilities Management receiving;
- College of Veterinary Medicine receiving; and
- Off-campus units directly receiving hazardous materials for commercial carriers.

EH&S will provide this training as applicable on an annual basis or as needed for new hires.

#### **REVIEW**

The Director of Environmental Health & Safety will review this operating policy every four years or when circumstances require an earlier review. Recommendations for revision will be presented to the Vice President for Research and Economic Development and the Vice President for Agriculture, Forestry, and Veterinary Medicine.

# **REVIEWED BY:**

/s/ Michael Parsons	03/02/2018
Director, Environmental Health & Safety	Date
/s/ David R. Shaw	03/05/2018
Vice President for Research and	Date
Economic Development	
/s/ Gregory A. Bohach	02/26/2018
Vice President for Agriculture, Forestry,	Date
and Veterinary Medicine	
/s/ Timothy N. Chamblee	03/06/2018
Assistant Vice President and Director	Date
Institutional Research and Effectiveness	
/s/ Joan Lucas	03/08/2018
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/a/ Marily Walanage	02/10/2010
/s/ Mark Keenum	03/18/2018 Data
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