Research Policy Series Policy and Procedure Statement on Transportation of Hazardous Materials or Dangerous Goods

OP 79.09

Purpose: This policy addresses acceptable training for employees that ship hazardous materials or dangerous goods (which includes infectious substances, dry ice, human or animal diagnostic specimens containing hazardous agents, compressed gases and more), record keeping requirements, security training, and guidelines for movement of hazardous materials or dangerous goods around campus.

Definitions: 1. “Hazardous material” is a substance or material which is capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and which has been so designated by the US Department of Transportation (DOT).
2. “Dangerous goods” means articles or substances which are capable of posing a significant risk to health, safety or to property when transported and are classified by the International Civil Aviation Organization (ICAO) or the International Air Transport Association (IATA) as dangerous goods.

Policy: All hazardous materials or dangerous goods that are shipped from campus by commercial transportation carriers must be shipped in accordance with all applicable Hazardous Materials Regulations as published in 49 Code of Federal Regulations by the US Department of Transportation.

All hazardous materials or dangerous goods shipped on behalf of Mississippi State University must be prepared, packaged, marked, and labeled by a University employee knowledgeable of the material or device and be currently trained in the shipping requirements for the mode(s) of transportation employed (air or ground).

Persons shipping materials by ground (highway) transportation must complete a comprehensive transportation class covering the shippers’ requirements in 49 CFR. Persons shipping by air must complete a suitable International Air Transporters Association (IATA) class. All shippers must attend an annual mode specific review class.

Shippers may satisfy the mandated training requirements by attendance of a Hazardous Materials Shippers class sponsored by the Office of Regulatory Compliance and Safety (ORCS). Alternate classes may be accepted but only at the discretion of the Director of Regulatory Compliance and Safety. To be approved to ship dangerous goods, an employee must provide copies of his/her initial training certification and copies of all annual refreshers. Training must be mode-specific (air or ground) and training certificates must specify the transportation mode(s) covered by the class.

No one may ship dangerous goods if more than twelve months has lapsed since their last refresher. Anyone failing to attend two consecutive annual training sessions must redo the initial training.

Employees receiving hazardous materials or dangerous goods must complete basic DOT awareness training and basic security training. This training is available through the MSU Office of Regulatory Compliance and Safety.
When shipping dangerous goods, only new or retested (and certified) UN approved containers may be used. Reuse of used UN containers that have not been recertified may not be used. The certification should be kept on file by the shipper.

All shippers will use the CHEMTREC telephone number as the 24 hour emergency contact number. This service is provided by the Office of Regulatory Compliance and Safety and only shippers registered with ORCS may use the service. In the event of hazardous waste shipments or radioactive waste shipments alternate numbers provided by the waste haulers may be used.

International shipments of hazardous materials or dangerous goods may also be subject to export requirements. Information on these requirements can be found on Sponsored Programs Administration's website.

Shipments of radioactive materials and hazardous waste must be coordinated through the Office of Regulatory Compliance and Safety.

The Office of Regulatory Compliance and Safety may conduct audits or shippers to verify that all components are being implemented and are adequate. This includes, for example, training, packaging, and proper completion of shipping papers.

Procedure: The process for shipping dangerous goods from Mississippi State University is as follows:

- The material to be shipped must be characterized sufficiently by the departmental shipper so that the proper hazardous class and shipping requirements can be determined.

- The material must be prepared for transportation in accordance with the applicable regulations for the mode of transportation. DOT “diamonds” are generally stocked by the Office of Regulatory Compliance and Safety.

- A material safety data sheet (MSDS) for the device or material being shipped must be provided to the Office of Regulatory Compliance two working days (excluding University holidays) in advance of the ship date. This will allow time to transmit a copy of the MSDS to CHEMTREC.

- The Office of Regulatory Compliance and Safety must be provided a signed copy of the shipping paper one working day (excluding University holidays) in advance of the ship date.

Transportation requirements for dangerous goods by Mississippi State University employees in University owned vehicles are excluded from many of the transportation requirements that must be employed when using commercial carriers. However, the following requirements must be met:

- Radioactive materials or hazardous waste must not be transported by any means on campus without the prior authorization of the Office of Regulatory Compliance and Safety.

THIS POLICY HAS BEEN SUPERSEDED
Hazardous materials or dangerous goods must be packaged in UN approved containers (for that hazardous material). Prior permission is required from the Office of Regulatory Compliance to use alternate containers.

Any spill or leakage of a hazardous material or dangerous good when being transported or any accident that involves a University vehicle transporting such materials must be reported immediately to the local law enforcement office (as appropriate) and to the Office of Regulatory Compliance.

Hazardous materials or dangerous goods belonging to Mississippi State University must not be transported in private or rented vehicles.

Only MSU employees may transport hazardous materials or dangerous goods in a University owned vehicle.

Review: This policy will be reviewed every four years or as needed by the Radiation Safety and Chemical Hygiene Officer with recommendations to the Director of Regulatory Compliance and Safety for review and transmission to the VP for Research and Economic Development and the VP for Division of Ag Forestry and Vet Med.