

Dangerous Goods Shipping Program

Purpose:

The Dangerous Goods Shipping Program ensures that all applicable regulations are followed when shipping or receiving dangerous goods and hazardous materials.

References:

- 49 Code of Federal Regulations §§ 172.1-172.804.
- 49 Code of Federal Regulations §§ 173.115-173.140.
- International Air Transport Association (IATA)
- International Civil Aviation Organization (ICAO)

Applicability:

This program applies to all NAU faculty, staff, students and volunteers who receive, ship or offer for shipment any hazardous materials or dangerous goods (HM/DG). Offering HM/DG for shipment includes outbound and inbound shipments to and from any Flagstaff Campus location. If you're shipping or receiving HM/DG from another campus, please contact EHS prior to doing so for further guidance.

Background:

The U.S. Department of Transportation (DOT) and International Air Transport Association (IATA) mandate function-specific training requirements for persons who receive, ship, or offer for shipment HM/DG. Offering HM/DG for shipment, including packaging and preparation of shipping papers, requires certified IATA and/or DOT training. All training must be documented, recorded, and up-to-date to comply with international, federal, and state regulations.

Definitions:

U.S. DOT describes a "hazardous material" as a substance or material that the Secretary of Transportation has determined is capable of posing an unreasonable risk to health, safety, and property when transported in commerce and is designated as hazardous under § 5103 of Federal Hazardous Materials Transportation Law. Hazardous materials include: hazardous substances, hazardous wastes, marine pollutants, materials designated in the Hazardous Materials Table (49 CFR 172.101), and materials that meet the defining criteria for hazard classes and divisions (49 CFR Part 173).

IATA "dangerous goods" are defined as articles or substances which are capable of posing a hazard to health, safety, property or the environment and which are shown in the list of dangerous goods in the IATA Dangerous Goods Regulations or which are classified according to those Regulations. For the purposes of this document and shipping at NAU, hazardous materials and dangerous goods are equivalent, as both require training for international or domestic shipping.

Requirements:

No person may receive, ship or offer for shipment HM/DG without DOT and/or IATA certified training **and** EHS approval. Training must be documented and included in the employee's training record. Only trained personnel authorized by EHS may ship HM/DG. Absolutely no materials classified as Class 1-explosive may be shipped or received at any NAU facility. Radioactive material requires Radiation Safety Officer approval prior to reception and/or shipment.

Shipping or offering for shipment shall include any shipment of HM/DG to or from NAU. This includes, but is not limited to, NAU personnel shipping HM/DG from off-campus locations to NAU Flagstaff Campus or any other location. Records of all shipments of HM/DG shall be maintained for at least three years.

Responsibilities:

Colleges, Schools and University Departments

It is the responsibility of each college, school, and administrative department to conduct its operations in accordance with all applicable laws and regulations, and to implement this policy as follows, including but not limited to:

1. Informing employees about workplace shipping and receiving procedures.
2. Providing required training to all persons handling hazardous materials.
3. Investigating incidents and employee complaints.
4. Documenting shipping and receiving activities
5. Enforcing interdepartmental policies

Environmental Health and Safety

Environmental Health and Safety *oversees* the HM/DG shipping program on campus. Certain EHS personnel are approved to ship HM/DG, but do not ship or receive such items on behalf of other departments. As the subject matter expert on the item(s) being shipped, it is the responsibility of the shipper/receiver to acquire approved IATA and/or DOT training. EHS is responsible for:

1. Chemical and Biological Laboratory Safety Training (or equivalent) for all HM/DG shippers
2. Reviewing shipping documents and packages prior to being offered for shipment
3. Providing referrals for approved third-party training vendors
4. Guidance/technical expertise around shipping HM/DG
5. Informing NAU personnel/departments of their responsibilities through initial training