

Transport and Shipment of Hazardous Materials and Dangerous Goods**POLICY**

University personnel are responsible for complying with applicable federal and state laws and regulations when engaging in the following activities or preparing materials related to the transport and shipment of hazardous materials or dangerous goods:

- Packaging
- Marking
- Labeling
- Preparing documentation
- Loading
- Offering materials for shipment

Likewise, University personnel who engage in the above activities must be properly trained in accordance with this policy.

Applicability

This policy applies to University personnel and students at all WSU locations, including, but not limited to, regional campuses, research stations, extension offices, nursing locations, other WSU-affiliated offices, and non-WSU offices.

Responsible Offices

Those having questions regarding this policy are to contact the applicable office below.

Hazardous Materials
Shipping

Contact the Office of Research Assurances (ORA);
telephone 509-432-3869.

Chemical Hazards

Contact the campus Environmental Health and Safety (EH&S)
office:

- Pullman; telephone 509-335-3041
- Spokane; telephone 509-358-7621
- Tri-Cities; telephone 509-372-7163
- Vancouver; telephone 360-546-9706
- Research and extension center (REC) support;
telephone 509-335-3041

Biological Hazards

Contact the Biological Safety Officer (BSO);
telephone 509-335-1585.

Radiation Hazards

Contact the Radiation Safety Office (RSO);
telephone 509-335-8916.

**Definition:
Hazardous Material/
Dangerous Good**

A dangerous good is defined as a substance or material that has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety and property when transported in commerce. Materials that are hazardous to the environment (i.e., hazardous substance, hazardous wastes, and marine pollutants) are also regulated.

5.40.2

Revised 5-19

Office of Research Assurances

509-432-3869

Transport and Shipment of Hazardous Materials and Dangerous Goods

Definition:

Hazardous Material/ Dangerous Good (cont.)

For purposes of this policy hazardous materials and dangerous goods are used interchangeably within this document. Hazardous materials include, but are not limited to:

- Laboratory, maintenance, and agricultural chemicals
- Biological agents
- Radioactive materials
- Compressed gases
- Dry ice
- Refrigerants and related equipment
- Lithium batteries
- Samples taken directly from an animal or a human
- Samples to be tested for a pathogen, virus, or bacteria
- Instruments/equipment that contain hazardous materials

Department of Transportation
(DOT)

Refer to DOT regulations for domestic transport of hazardous materials by rail, air, vessels, and motor carrier at 49 *CFR* 100-185.

International Air Transport
Association (IATA)

IATA has established guidelines for the transport of dangerous goods by air.

Hazardous Materials Transportation Security Plan (HMTSP)

Certain shipments of hazardous materials, including select agents or large amounts of poisons (DOT Hazard Class 6) may require a security plan. Contact ORA for assistance when applicable.

Department of Homeland
Security Chemicals of
Interest (COI)

University faculty, staff and students may not ship any chemical on the Department of Homeland Security's Chemicals of Interest (COI) list. If assistance is needed contact EH&S to determine available options.

SHIPPING REQUIREMENTS

Trained Coordinators

Any University student, staff, or faculty member who intends to offer dangerous goods for transportation or shipment must either be a trained University dangerous goods shipping coordinator or must contact a trained University dangerous goods shipping coordinator for assistance.

The training must be in conformance with 49 *CFR* 172 Subpart H and include IATA training. See [Training](#) below for training requirements.

Coordinator Database

ORA maintains a database of trained shipping coordinators. Telephone this office at 509-432-3869 to obtain contact information for trained shipping coordinators.

Transport and Shipment of Hazardous Materials and Dangerous Goods

Coordinators for WSU Locations

Each WSU location that offers dangerous goods for shipment is required to ensure that:

- At least one employee is trained as a dangerous good shipping coordinator, *or*
- The person preparing the shipment seeks the assistance of a trained dangerous goods shipping coordinator when preparing shipments of dangerous goods. (See [Coordinator Database](#) above to obtain assistance.)

The trained dangerous goods shipping coordinator is responsible for ensuring that all packages offered for shipment are prepared according to the applicable shipping regulations.

Emergency Response Information

An emergency response telephone number must be provided on shipping papers associated with certain hazardous materials. The telephone number must be monitored 24 hours a day while the hazardous material is in transportation, including storage incidental to transportation. This telephone number must be the number of either:

- The person offering the hazardous material for transportation (if trained as a dangerous goods shipping coordinator); *or*
- The number of an agency or organization capable of, and accepting responsibility for, providing detailed information concerning the hazardous material.

To provide this emergency response contact, WSU maintains a service contract with a third-party vendor that assists emergency responders in dealing with incidents involving hazardous materials in transit.

It is the responsibility of the person packaging the materials for shipping to ensure that certain packages containing hazardous materials lists the proper emergency response telephone contact number.

Contact ORA for more information or to obtain the third-party emergency response vendor's telephone number; telephone 509-432-3869.

EXCEPTIONS

Shipments prepared under the following circumstances are not subject to requirements of this section, other than as noted.

Transport and Shipment of Hazardous Materials and Dangerous Goods

Internal WSU Transport

The transport of hazardous materials by University personnel, either in person or when using University or private vehicles, solely for non-commercial University purposes is exempt from DOT regulations but must comply with this policy.

Requirements

Transport of hazardous materials by University personnel may be conducted only when the following conditions or requirements are fulfilled.

Containers

- The material must be in appropriate, leak-proof containers or packaging.
- Secondary containment is to be used to contain any spill of the hazardous materials being transported.
- Incompatible materials are to be separated into different secondary containers.
- When in a vehicle, hazardous materials are to be transported in the trunk, or as far away from passengers as possible.
- All containers are to be clearly labeled with content information and precautionary instructions (e.g. warning labels for pesticides, controlled substances, etc.). Individuals must have access to Safety Data Sheets.

Materials and Supplies

Materials and supplies, including personal protective equipment needed to contain or clean up a spill are to be available in the vehicle. (See [Individuals](#).)

Individuals

Individuals transporting hazardous materials must either:

- Carry a method of communication should a spill or release occur,
- Be accompanied by another individual, or
- Be in an area where campus EH&S personnel can respond in a timely manner.

See [Training](#), [Vacating Areas or Employment](#), and [Regulations and Approvals](#) below for additional requirements applicable to individuals transporting hazardous materials.

Transport and Shipment of Hazardous Materials and Dangerous Goods*Training*

The individual transporting hazardous materials must be trained and familiar with each material's hazards, the precautionary measures to avoid those hazards, and procedures to contain or clean up a spill or contact appropriate personnel. It is strongly recommended that individuals new to transporting hazardous materials, or transporting new or different materials consult with EH&S staff to ensure they have appropriate knowledge, training, and materials to safely transport hazardous materials.

*Vacating Areas or
Employment*

Individuals vacating University areas or moving from one campus to another must follow the procedures in *Business Policies and Procedures Manual (BPPM)* 60.38 and 60.74.

Regulations and Approvals

Individuals transporting hazardous materials from one campus to another, or from a research site must follow the regulation listed above (see [Department of Transportation \(DOT\)](#)) and be approved by:

- EH&S for the transporting of chemicals,
- ORA for the transportation of biological materials, and/or
- RSO for the transporting of radioactive materials.

Radioactive Materials

All outgoing University shipments of radioactive materials or radiation machines must be coordinated through the Radiation Safety Office (RSO); telephone 509-335-8916. This requirement applies to all University locations. RSO handles all aspects of such shipments, including coordination with the transporter.

Shipment of Wastes**Hazardous Chemical Wastes**

This section does not apply to hazardous chemical wastes. See *SPPM* 5.66 and 5.68 for procedures for managing hazardous chemical wastes. NOTE: The campus EH&S coordinates and contracts for the transportation of chemical wastes.

Radioactive Wastes

This section does not apply to radioactive wastes. See *SPPM* 9.70 for procedures for managing radioactive wastes. For current guidelines refer to the RSO website at:

rso.wsu.edu/

Biohazard Wastes

This section does not apply to biohazard waste offered for shipment in commerce. See *SPPM* 4.24 for procedures for managing biohazard wastes. For further information, refer to the Biosafety website at:

biosafety.wsu.edu/biohazardous-waste/

Transport and Shipment of Hazardous Materials and Dangerous Goods

TRAINING

It is the responsibility of the supervisor to ensure that the dangerous good shipping coordinator has received adequate training related to their job functions. In accordance with 49 *CFR* 172 Subpart H, the employer or supervisor must certify that the shipper's training is appropriate for the types of shipments their employees offer into commerce.

The shipper's supervisor is accountable for any noncompliance issues that may result from inadequate training. Therefore, when identifying training options for the dangerous goods shipping coordinator the supervisor is encouraged to contact ORA for guidance.

Office of Research Assurances (ORA)

ORA arranges and coordinates the training requirements for the University. Contact ORA to request information regarding training options for both initial and refresher training.

Confirmation of Training

After successful completion of hazardous materials training, the employee must provide ORA with a copy of the hazardous materials training certificate for inclusion in the shipping coordinators database.

Refresher Training

The University requires refresher training every two years for all shipping coordinators. It is the responsibility of each department requiring a trained coordinator to monitor and ensure compliance with these requirements.

IMPORT/EXPORT

Importing Materials

Persons importing dangerous goods into the United States must provide the shipper and forwarding agent at the place of entry with information regarding the requirements of the Hazardous Materials Regulations (49 *CFR* Subpart C) applicable to the shipment while in the United States.

Exporting Materials

Prior to exporting any item, technology, or software from the United States, individuals must contact the University Export Control Officer to perform an export control review; email:

or.ora.export@wsu.edu

NONCOMPLIANCE

Intentional Noncompliance

Intentional disregard or deliberate noncompliance with this University policy by any student, staff member, administrator, or faculty member may result in University corrective or disciplinary action.

Transport and Shipment of Hazardous Materials and Dangerous Goods

Legal Penalties

Failure to comply with 49 *CFR* may result in penalties for WSU and/or an employee.

WSU may be subject to civil penalties that can range from \$275 to \$75,000 per violation per day.

Individuals can be subject to criminal penalties for knowing and willing violations. Such penalties can range up to \$182,877 and if found guilty, an individual may face up to ten years in prison.

Defense and Indemnification

Whenever a WSU officer, agent, or employee may, as a result of the good faith performance of his or her WSU duties, becomes subject to a lawsuit, claim, action, or proceeding, the law provides that the Board of Regents may authorize the defense of, and payment of all costs of, the proceeding. This includes the costs of any judgment that may arise out of the claim or proceeding. See *BPPM* 10.15. (*RCW* 28B.10.842)