

Environmental Health and Safety Manual (EHS)

EHS 406: Shipping and Receiving Hazardous Materials

Effective: 3/1/2008

Revised: 8/1/2021

Purpose

To ensure that regulations are followed when hazardous materials or dangerous goods are received, shipped, or offered for shipment.

To ensure that ASU is in compliance with US Department of Transportation and International Air Transport Association regulations.

Sources

49 Code of Federal Regulations §§ 172.1–172.804

49 Code of Federal Regulations §§ 173.115–173.140

International Air Transport Association (IATA) 5.0

Applicability

This policy applies to all ASU faculty, staff, students and volunteers who receive, ship, or offer for shipment any hazardous materials or dangerous goods. Offering hazardous materials or dangerous goods for shipment includes outbound and inbound shipments both to and from all ASU facilities.

Background

The US Department of Transportation (US DOT) mandates specific certified training requirements for persons who receive, ship, or offer for shipment hazardous materials/dangerous goods (HM/DG). Receiving HM/DG requires function-specific training relating to the extent of the person's involvement. Shipping or offering for shipment—including packaging for shipment and preparation of shipping papers— requires certified training. All training must be documented and all training must be current per regulation.

The US 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 the federal Hazardous Materials Transportation law. Hazardous materials include: hazardous substances, hazardous waste, marine pollutants, elevated temperature materials, 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).

Policy

No person may **receive** a HM/DG without function-specific training. Training must be documented and included in the employee's training record. Only trained personnel authorized by EHS may ship hazardous materials.

Absolutely no materials labeled class 1-explosive, or class 7-radioactive may be received directly at any ASU facility except those shipped directly to the EHS Central Receiving Facility. Refuse any shipment and call EH&S at 480-965-1823 immediately.

No person may **ship or offer for shipment** HM/DG unless that person has received either function specific training or is currently certified as completing 16-hour US DOT training for hazardous materials. Additionally, shipments or offers to ship HM/DG by air also require either function specific training or current certification for International Air Transport Association (IATA) regulations training. All training must be current per regulation, documented, and included in the employee's EH&S training record.

The shipping function may be completed by a properly trained and certified third-party freight forwarder if one is available.

Shipping or offering for shipment shall include any outbound or inbound shipment to or from ASU being made on behalf of or for ASU.

This includes, but is not limited to, shipments of HM/DG from off-campus locations or persons to any campus location or person, or to any permanent or temporary ASU-affiliated off-campus location or person.

Records of all shipments of HM/DG shall be maintained for at least two (2) years.

Responsibilities

Colleges, Schools, and Other 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. enforcing policies;
- and
5. appropriately documenting shipping and receiving activities.

Environmental Health and Safety (EHS)

1. EHS provides function-specific training in its Laboratory Safety; initial and annual refresher/training programs.
2. EHS does provide targeted training for commonly shipped HM/DG such as dry ice and UN 3733 that may be used only for shipping those specific items. Comprehensive DOT or IATA training is available through third parties and may be completed at the department's expense. Anyone completing this training on behalf of ASU must forward a copy of their training certificate to EHS and maintain a log of all ASU related shipments.
3. EHS will maintain training records and a list of certified shippers, and provide shipping guidance as needed.

Cross-References

For related information, see:

1. [EHS 005](#), "Management Policy."
2. [EHS 103](#), "Hazard Communication Program."
3. [EHS 104](#), "Laboratory Use of Hazardous Chemicals."
4. [EHS 112](#), "Biosafety Policy Governing the Possession, Use, and Transfer of Biological Agents and Toxins of Biological Origin."

5. [EHS 401](#), "Hazardous Waste Management."