



Title: Shipping of Hazardous Materials (Dangerous Goods)	Policy Category: Environmental Health & Safety
Issuing Authority: Enterprise Risk Management	Responsibility: Environmental Health and Safety
Publication Date:	Next Review Date:

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Policy Statement/Background:

Individuals who package, ship or transport hazardous materials or dangerous goods (HM/DG Shippers) must comply with this policy and all of the rules and regulations of the US Department of Transportation (US DOT), the International Air Transportation Association (IATA), other approved carriers and regulatory agencies. Only properly trained and documented University/Hospital HM/DG Shippers are allowed to ship or transport hazardous materials.

Policy:

A. Responsibilities

1. Environmental Health and Safety (EH&S)
 - a. Provides appropriate training for HM/DG shipping.
 - b. Provides technical guidance upon request to departments in the shipment of regulated hazardous materials.
 - c. Maintains and updates the Stony Brook [hazardous materials shipping website](#).
 - d. Conducts periodic audits for hazardous materials shipping compliance.
 - e. Investigates hazardous materials shipping discrepancies and carrier-rejected shipments.
 - f. Notifies responsible parties of any hazardous materials shipping discrepancies or regulatory actions affecting their operations, and shares "lessons learned" with other departments as applicable.
 - g. Shall be the Point of Contact (POC) for deficiencies communicated to the appropriate regulatory agencies as required.
 - h. Resources for additional lab safety policies and training can be found at the [Lab Safety Webpage](#).

2. Any Stony Brook employee who has direct oversight of HM/DG Shippers shall:
 - a. Notify the Department of Environmental Health and Safety at 631-632-6410 or ehsafety@stonybrook.edu if contacted by any outside regulatory agency.
 - b. Ensure that all employees who work with hazardous materials obtain and maintain the appropriate level of training for their job responsibilities.
 - c. Be responsible for any expense incurred in safe and compliant shipping of hazardous materials.
 - d. Designate an individual within the lab/facility to ensure compliance with this policy.
 - e. Ensure that all hazardous materials are identified, classified, packaged, marked, and labeled in accordance with the appropriate shipping regulations prior to offering for transport.
 - f. Pay associated fines and penalties for any compliance deficiencies.
 - g. Comply with and assist EH&S in implementing this policy.
 - h. Support EH&S and/or regulatory agencies during audits and investigations.
 - i. Assure this policy is being implemented within their area of responsibility.

B. Training

1. All HM/DG Shippers must complete EOS016/051 (Main Campus) or EUH008 (Hospital) Shipping of Dangerous Goods Training. First-time trainees must complete the in-person EOS016/EUH008 training. For subsequent training, they may take either the in-person EOS016 or EOS051 training. EH&S coordinates the in-person training.
2. This training must be renewed every two (2) years in accordance with IATA regulatory standards.
3. EH&S shall maintain training records.

C. Recordkeeping

1. HM/DG Shippers must maintain files which include copies of all shipping papers and training records.
2. Documentation (manifests) related to shipping of hazardous materials must be retained for at least 24 months after the date of shipment.
 - a. Documents for international shipments are required to be maintained for five (5) years.
3. Supervisors are required to maintain a list of employees designated as HM/DG Shippers and provide this list upon request to EH&S or the visiting regulatory agency.

D. Separation and Segregation - HM/DG Shippers must ensure the proper segregation and storage of materials during storage and transport.

E. Self-Transport via Ground

1. The movement of regulated hazardous materials within the University's campus is not regulated by US DOT as a hazardous materials shipment, although training and safety precautions are still required. Contact EH&S for additional assistance. 631-632-6410 or ehsafety@stonybrook.edu.
2. Transporting hazardous materials on public roads is prohibited, unless conducted in accordance with US DOT "Materials of Trade" (MOT) regulations. Employees using the MOT regulation must be familiar with the standard and must have completed the EOS016 Shipping of Dangerous Goods training.

F. Self-Transport Via Air - Self Transporting regulated hazardous materials or non-regulated hazardous materials via air is **PROHIBITED**. Items may be classified unknowingly and/or fall under export control regulations, such that additional restrictions may apply. Contact EH&S at 631-632-6410 for advice or assistance.

G. International Shipments / Export Controls

1. International shipments, whether imported or exported, may require permits and/or licensing authority.
2. All outgoing shipments (whether or not HM/DG) must comply with U.S. export control laws as well as institutional policies. Including, but not limited to the following:
 - a. International Shipment and Transfer Guidance
 - b. Classification of Item/Information Procedure
 - c. P212: Stony Brook University Export Control Policy
3. Questions regarding international shipments and U.S. export control laws should be directed to:

Office of Research Security
ovpr_exports_admin@stonybrook.edu

H. Packaging and Shipment

1. HM/DG Shippers must determine if the material they are shipping is a hazardous material outlined in the training. Once a determination is made, the employee must package the material in conformance with DOT and IATA regulations, complete the appropriate shipping documents and request a pickup of the material by the appropriate hazardous material shipping company.
2. EH&S serves as a resource for all employees involved in shipping goods, to assist in determining if the material is hazardous and provide advice on proper packaging. Contact 631-632-6410 for assistance.
3. HM/DG Shippers are responsible for obtaining the proper materials necessary to ship regulated materials in compliance with the regulations. This may include but not limited to:

- a. Diagnostic packaging
 - b. Diagnostic ambient packaging
 - c. Infectious packaging
 - d. Infectious ambient packaging
 - e. Infectious refrigerated packaging
 - f. Single/Double hazard packaging
 - g. Manifests/Shipper's Declaration for Dangerous Goods
 - h. Radioactive hazard packaging
 - i. Crates/Pallets
 - j. Boxes/Overpacks
 - k. Drums/Pallets
 - l. Containers
 - m. Barrels
 - n. Labels
4. HM/DG Shippers must have access to the most recent editions of IATA (International Air Transport Association) Dangerous Goods Regulations and/or U.S. DOT 49 CFR Parts 100 to 185 Transportation on site for reference.

I. Specific Hazardous Materials

1. Infectious Substances
 - a. Shipments containing DOT Class 6.2 infectious substances are strictly regulated. These are substances known to contain, or reasonably expected to contain pathogens, such as Infectious Substances (Category A) and Biological Substances (Category B).
 - b. Exempt biological shipments sent via air may require specific packaging requirements as well.
 - c. Specific training requirements are identified in the EH&S EOS 016/051 and/or EUH 008 Shipping of Dangerous Goods training.
2. Dry Ice
 - a. Shipments containing dry ice are regulated when transported by air or overwater.
 - b. Quantity limits apply and vented packaging is required.
 - c. Visit the [Dry Ice EH&S website](#) for additional information on shipping dry ice.
3. External Infectious Substances Training - Packaging and Shipping Division 6.2 Materials (infectious materials) training can also be completed online, at no cost, through the [Center for Disease Control \(CDC\) Training website](#) or other approved external training websites. Course certificates must be forwarded to EH&S.

Definitions:

Dangerous Goods (DG) - hazardous chemicals or infectious substances that are capable of posing a risk to health, safety, property, or the environment when

transported typically via air or internationally. Additional information can be found at the USDOT website: <https://www.phmsa.dot.gov/standards-rulemaking/hazmat/hazardous-materials-information-center> and International Air Transport Association (IATA), <https://www.iata.org/whatwedo/cargo/dgr/Pages/index.aspx>

Hazardous Material (HM)- substances or material that pose an unreasonable risk to health, safety, property or the environment when transported in commerce. Also known as materials "Regulated for Transportation." For the purposes of this policy, DG and HM can be used interchangeably.

Infectious Substances - substances known to contain, or reasonably expected to contain pathogens, such as Infectious Substances (Category A) and Biological Substances (Category B).

HM/DG Shipper: Any employee including but not limited to staff, faculty, student or agent of Stony Brook University/Hospital that offers a hazardous material for shipment via carrier such as, but not limited to, United States Postal Service (USPS), Fed Ex, United Parcel Service, trucking company or transportation by staff, faculty, student, or agents of the University/Hospital in University/Hospital or personal vehicles. The regulation applies to both domestic and international shipments regardless of mode of transportation, be it by land, air or sea.

Materials of Trade (MOT)- hazardous materials, other than hazardous waste, that are carried on a motor vehicle to directly support a principal business. Examples include landscaping, pest control, painting, plumbing, and welding. Employees handling materials of trade must have general knowledge of relevant regulations, quantity limitations, and packaging and labeling requirements.

Operator/Carrier - are individuals, courier companies (e.g., UPS, FedEx) or airlines that transport packages from point of origin to point of destination.

Pathogens - are microorganisms (including bacteria, viruses, rickettsia, parasites, fungi) or recombinant microorganisms (hybrid or mutant) that are known to cause infectious disease in humans and animals.

Proper shipping name – a universally recognized designation used to describe a particular article or substance in all shipping documents and notifications and, where appropriate, on packaging.

Receiver (Consignee) - employee who receives, unloads or unpacks and signs for the regulated material packages.

Shipper's Declaration - a declaration that hazardous materials being shipped have been classified, labeled, marked, and packed in

accordance with IATA requirements..

Shipper (Consignor) - employee who prepared the DG for shipment and offers the shipment to the Operator or carrier (e.g., UPS, FedEx).

Contact:

Additional information about this policy is available here:

Shipping of Dangerous Goods Webpage

Relevant Standards, Codes, Rules, Regulations, Statutes, and Policies:

Forms:

NA

Policy Cross Reference:

P212 Export Control Policy

Relevant Standards/Codes/Rules/Regulations/Statutes:

Code of Federal Regulations – (CFR) Title 49, Parts 100-185, Transportation

Code of Federal Regulations – (CFR) Title 40, Protection of the Environment

Code of Federal Regulations – (CFR) Title 10, NRC Regulations

References and Resources:

- **USDOT Hazardous Materials Information Center,**
- **International Air Transport Association (IATA), Dangerous Goods**
- **International Air Transport Association (IATA), Infectious Substances**
- **DOT Emergency Response Guidebook,**
- **NIOSH Pocket Guide to Chemical Hazards,**