



TEXAS TECH UNIVERSITY HEALTH SCIENCES CENTER EL PASO

Operating Policy and Procedure

HSCEP OP: 75.13, Shipment and Transport of Hazardous and Infectious Materials

PURPOSE: The purpose of this Texas Tech Health Sciences Center El Paso (TTUHSC El Paso) Operating Policy and Procedure (HSCEP OP) is to provide guidance and assistance in the implementation of the various TTUHSC El Paso Safety Programs. To establish policy and procedure for assuring the shipment and transportation of all hazardous and infectious materials is conducted in compliance with applicable rules, regulations and guidelines governing the classification, description, labeling, marking, record keeping, training and packaging of hazardous and infectious materials. These procedures are to assure that these materials are handled in a manner that reduces risk of exposure to employees, shipping and transportation personnel, the general public, the recipient, the environment and the material during its transport. It also assures that proper and required communication of potential hazard is conveyed to applicable persons involved in the shipping and transportation process. This OP applies to all TTUHSC El Paso buildings, owned and leased.

REVIEW: This HSCEP OP will be reviewed on March 1 of each odd-numbered year (ONY) by the Senior Director of Safety Services with recommendations for revision forwarded to the Managing Director for Facilities Support Services and to the President.

POLICY/PROCEDURE:

1. Background.

Regulation and oversight of the safe shipment of hazardous materials and dangerous goods within the United States (US) and internationally is overseen by numerous regulatory bodies and agencies. This policy addresses compliance with safe shipping regulations and practices to protect employees and the public, to avoid delay in shipping or transporting of hazardous materials or dangerous goods, and to prevent potential civil or criminal penalties resulting from non-compliance.

2. Applicable Regulations.

Several government agencies and industry groups regulate the packaging, labeling and shipment of hazardous and infectious materials within the US and internationally.

- U.S. Department of Transportation (DOT) Hazardous Materials Regulations, at 49 CFR parts 171-180.
- United States Postal Service (USPS)
- U.S. Department of Labor, Occupational Safety and Health Administration (OSHA), at 29 CFR 1910.1030, Occupational Exposure to Bloodborne Pathogens
- U.S. Department of Commerce (DOC)
- International Air Transport Association (IATA).
- U.S. Department of Health & Human Services, Centers for Disease Control and Prevention (CDC) regulations, at 42 CFR part 72
- Texas Department of Public Safety (DPS) Regulations Governing Hazardous Materials at 37 TAC §4.1
- Texas Department of State Health Services, Radiation Control Program (TDSHS-RCP) at 25 TAC §289.257

3. Definitions.

Dangerous Goods: Also known as “hazardous materials” or “hazmat”, is any substance or material that is capable of posing an unreasonable risk to health, safety, property, or the environment when transported in commerce.

Hazardous Materials: Also referred to as “hazmat” or “dangerous goods”, includes articles or substances which are capable of posing a risk to health, safety, property, or the environment.

Hazmat employee: Any employee who handles, offers for transport, transports, or causes hazardous materials to be transported.

Infectious Substances: Substances which are known or reasonably expected to contain pathogens.

Pathogens: Micro-organisms (including bacteria, viruses, rickettsia, parasites, fungi, etc.) and other agents such as prions, which can cause disease in humans or animals.

4. **Responsibilities.**

The clinical or laboratory manager/supervisor is responsible for assuring that all specimens shipped from his or her facility comply with the requirements of this policy.

The clinical or laboratory manager/supervisor is responsible for providing appropriate training to any employee who will be responsible for packaging or shipping hazardous or infectious substances and ensuring that such training is properly documented.

The hazmat employee (“shipper” or “transporter”) is responsible for complying with this policy and bringing any problems or questions regarding these procedures to the attention of his or her supervisor or the appropriate local or regional TTUHSC El Paso Safety Services Office.

The TTUHSC El Paso Safety Services Department is responsible for providing technical support, reviewing and updating this policy as required, coordinating and documenting necessary training of supervisors and employees, and compliance audits of shipping sites. Additionally, Attachment A, Risk Assessment Approval from Safety Services will be completed and approved by a member of Safety Services if the package is being transported by ground in an approved State or Institutional Vehicle.

5. **Training.**

Shippers of dangerous and regulated materials including packers must receive initial and recurrent training. This training may be provided by a commercial shipping training program, or presented or coordinated through the Safety Services Department. Copies of certifications and training programs will be maintained by the Safety Services Department. Clinical or laboratory managers/supervisors shall forward a copy of training certificates from non-TTUHSC El Paso programs to Safety Services.

Due to the clinical nature of the majority of regulated shipments from TTUHSC El Paso, two training programs will be maintained; one for all classes of hazardous materials (“hazmat”) and another with a focus on Class 6.2 Infectious Substances. Each program requires initial training, followed by recurrent refresher training every two years.

Safety Services provide online training that will have to be completed by shippers.

If a shipping declaration form is required for the shipment, a copy of the completed declaration form must be forwarded to Safety Services for review prior to shipment.

6. **International Shipment (i.e. Exports).**

International shipments may be subject to additional regulations, including Export Controls and/or International Air Transport Association (IATA) Dangerous Goods Regulations (DGR), and may

require specific training or licensing. Review [HSCEP OP 73.16](#) to determine the requirements for your shipment.