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NMSU Hazardous Material Shipper Training & Certification Requirements

Introduction

Under the USDOT's Hazardous Materials Regulations (HMR) (49CFR Parts 171-181) employees who can "directly affect hazardous materials transportation safety" are required to complete applicable Hazardous Material Shipper training. In general, the HMR regulations govern the shipment of hazardous materials (HM) by ground and the International Air Transport Association (IATA) regulations govern the shipment of dangerous goods (DG) by air.

NMSU EH&S provides full HM/DG shipping services to the university community on main campus in Las Cruces. In addition, NMSU EH&S has the responsibility to certify other employees at main campus and remote NMSU facilities who ship hazardous material or dangerous goods. Any NMSU employee who ships a hazardous material or dangerous good from NMSU must be approved, in writing, by EH&S. It is the employee's responsibility to notify EH&S prior to shipping hazardous materials and to submit training documentation for EH&S review.

Shipper Training & Certification

Shipper certification is achieved by completing the applicable required training defined in this section and **Table 1**. Alternate training may be acceptable but must first be reviewed and approved in writing by NMSU EH&S.

Required Training Elements

The basic elements that must be covered in all shipper certification training include:

1. General Awareness Training – Provides an overview of hazardous materials and what makes them dangerous in transportation.
2. Security Awareness Training – Shows employees how to identify and react to potential security threats, including threats from terrorism.
3. Function-Specific Training – Covers the requirements employees must know to properly and safely conduct the specific, shipping related functions they perform.

Additional, specialized training may also be required depending on the type and amount of hazardous material that is handled:

1. Safety Training – Required for employees who handle or may be exposed to hazardous materials in the workplace including shipping processes.
2. DOT Security Plan Training – Businesses that ship hazardous materials in large volumes or ship particularly high-risk materials must maintain a DOT hazmat security plan. Employees must be trained on the specific elements of that plan, including any specific responsibilities delegated to them. Currently this training only

applies to a limited number of NMSU EH&S staff directly involved in the shipment of hazardous waste and high-risk materials as defined in the HMR.

Frequency of Training

1. Initial training must be completed within 90 days of the date hire or the date the employee’s job function will “directly affect hazardous materials transportation safety”.
2. DOT refresher training is required every 3 years for employees who ship hazardous material by ground.
3. IATA refresher training is required every 2 years for employees who ship dangerous goods by air.

Table 1. Current approved shipper certification training which meets the requirement of 49CFR 172.202(c)¹.

Training Element	Provider	Approved Training
General Awareness	NMSU Or Lion Technology	PERS Hazmat Employee Training Workbook Or Approved Lion Technology shipper training course which includes General Awareness training.
Security Awareness	NMSU Or Lion Technology	TSA Security Action Item Training DVD Or Approved Lion Technology shipper training course which includes Security Awareness training.
Function Specific – Ground Shipping	NMSU Or Lion Technology	In-house training on approved function-specific internal procedures Or Approved Lion Technology Hazmat Ground Shipper Certification course
Function Specific – Air Shipping	NMSU Or Lion Technology	In-house training on approved function-specific internal procedures Or Approved Lion Technology Hazmat Air Shipper Certification course
Function Specific – Class 6.2 Infectious Biological Materials	CITI Program	Approved CITI Program – Shipping and Transport of Regulated Biological Materials which includes all applicable components of hazardous materials shipper training.
Dry Ice Only Shipper Certification	NMSU	In-house training - NMSU Dry Ice Shipping Training course (Course covers all required basic shipper training elements listed above)
Safety Training	NMSU	In-house training - NMSU Hazard Communication Training Class
DOT Security Plan	NMSU	In-house training - NMSU Hazardous Material Transportation Security Plan Review (EH&S Personnel only)

¹Alternate training options may be allowed but require review and written approval by NMSU EH&S.