

 <p>HAWAII HEALTH SYSTEMS C O R P O R A T I O N <i>"Touching Lives Everyday"</i></p> <p>Policies and Procedures</p>	<p>Quality Through Compliance</p>	<p>Policy No.:</p> <p>EOC 0001</p>
		<p>Revision No.:</p> <p>N/A</p>
<p>Subject:</p> <p>Laboratory: Packaging and Shipping of Dangerous Goods</p>	<p>Issued by:</p> <p>Corporate Compliance Committee</p>	<p>Effective Date:</p> <p>January 12, 2000</p>
	<p>Approved by:</p> <p>Thomas M. Driskill, Jr. President & CEO</p>	<p>Supersedes Policy:</p> <p>N/A</p> <p>Page:</p> <p>1 of 1</p>

- I. **PURPOSE:** To ensure that only certified employees package and ship dangerous goods.
- II. **POLICY:** According to the Federal Aviation Administration ("FAA") regulation S 172.700 49 CFR CH:1 (10-1-99 Edition) only those employees which are trained according to these guidelines may package and ship dangerous goods (Attachment A).
- III. **PROCEDURE:**
 - A. Any request that comes into a department, either verbally or written, which states that a dangerous good must be packaged and shipped to a vendor or to another facility off island must be forwarded to an employee that is certified to package and ship dangerous goods.
 - B. Each facility will keep a list of all the employees that are currently certified to package and ship dangerous goods. These lists only pertain to laboratory personnel who are certified to package and ship dangerous goods in the laboratory.
 - C. There may be other departments that may ship dangerous goods such as surgery, radiology or oncology. If any of the employees in these departments ship dangerous goods, they must also be certified. The facilities must then keep a list of employees in these departments who are currently trained.

Attachment: A. Extract from 49CFR172

[Code of Federal Regulations]
[Title 49, Volume 2, Parts 100 to 185]
[Revised as of October 1, 1999]
From the U.S. Government Printing Office via GPO Access
[CITE: 49CFR172.701]

TITLE 49--TRANSPORTATION

CHAPTER I--RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION, DEPARTMENT OF
TRANSPORTATION

PART 172--HAZARDOUS MATERIALS TABLE, SPECIAL PROVISIONS, HAZARDOUS MATERIALS
COMMUNICATIONS, EMERGENCY RESPONSE INFORMATION, AND TRAINING REQUIREMENTS--
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Subpart H--Training

Source: Amdt. 172-126, 57 FR 20952, May 15, 1992, unless otherwise
noted.

Sec. 172.700 Purpose and scope.

(a) Purpose. This subpart prescribes requirements for training
hazmat employees.

(b) Scope. Training as used in this subpart means a systematic
program that ensures a hazmat employee has familiarity with the general
provisions of this subchapter, is able to recognize and identify
hazardous materials, has knowledge of specific requirements of this
subchapter applicable to functions performed by the employee, and has
knowledge of emergency response information, self-protection measures
and accident prevention methods and procedures (see Sec. 172.704).

(c) Modal-specific training requirements. Additional training
requirements for the individual modes of transportation are prescribed
in parts 174, 175, 176, and 177 of this subchapter.

Sec. 172.701 Federal-State relationship.

This subpart and the parts referenced in Sec. 172.700(c) prescribe
minimum training requirements for the transportation of hazardous
materials. For motor vehicle drivers, however, a State may impose more
stringent training requirements only if those requirements--

(a) Do not conflict with the training requirements in this subpart
and in part 177 of this subchapter; and

(b) Apply only to drivers domiciled in that State.

Sec. 172.702 Applicability and responsibility for training and testing.

(a) A hazmat employer shall ensure that each of its hazmat employees
is trained in accordance with the requirements prescribed in this
subpart.

(b) Except as provided in Sec. 172.704(c)(1), a hazmat employee who
performs any function subject to the requirements of this subchapter may
not perform that function unless instructed in the requirements of this
subchapter that apply to that function. It is the duty of each hazmat
employer to comply with the applicable requirements of this subchapter

and to thoroughly instruct each hazmat employee in relation thereto.

(c) Training may be provided by the hazmat employer or other public or private sources.

(d) A hazmat employer shall ensure that each of its hazmat employees is tested by appropriate means on the training subjects covered in Sec. 172.704.

[Amdt. 172-126, 57 FR 20952, May 15, 1992; 57 FR 22182, May 27, 1992, as amended by Amdt. 172-149, 61 FR 27173, May 30, 1996]

Sec. 172.704 Training requirements.

(a) Hazmat employee training shall include the following:

(1) General awareness/familiarization training. Each hazmat employee shall be provided general awareness/familiarization training designed to provide familiarity with the requirements of this subchapter, and to enable the employee to recognize and identify hazardous materials consistent with the hazard communication standards of this subchapter.

(2) Function-specific training. (i) Each hazmat employee shall be provided function-specific training concerning requirements of this subchapter, or exemptions issued under subchapter A of this chapter, which are specifically applicable to the functions the employee performs.

(ii) As an alternative to function-specific training on the requirements of this subchapter, training relating to the requirements of the ICAO Technical Instructions and the IMDG Code may be provided to the extent such training addresses functions authorized by Secs. 171.11 and 171.12 of this subchapter.

(3) Safety training. Each hazmat employee shall receive safety training concerning--

(i) Emergency response information required by subpart G of part 172;

(ii) Measures to protect the employee from the hazards associated with hazardous materials to which they may be exposed in the work place, including specific measures the hazmat employer has implemented to protect employees from exposure; and

(iii) Methods and procedures for avoiding accidents, such as the proper procedures for handling packages containing hazardous materials.

(b) OSHA or EPA Training. Training conducted by employers to comply with the hazard communication programs required by the Occupational Safety and Health Administration (OSHA) of the Department of Labor (29 CFR 1910.120) or the Environmental Protection Agency (EPA) (40 CFR 311.1), to the extent that training addresses the training specified in paragraph (a) of this section, may be used to satisfy the training requirements in paragraph (a) of this section, in order to avoid unnecessary duplication of training.

(c) Initial and recurrent training--(1) Initial training. A new hazmat employee, or a hazmat employee who changes job functions may perform those functions prior to the completion of training provided--

(i) The employee performs those functions under the direct supervision of a properly trained and knowledgeable hazmat employee; and

(ii) The training is completed within 90 days after employment or a change in job function.

(2) Recurrent training. A hazmat employee shall receive the training required by this subpart at least once every three years.

(3) Relevant Training. Relevant training received from a previous employer or other source may be used to satisfy the requirements of this

subpart provided a current record of training is obtained from hazmat employees' previous employer.

(4) Compliance. Each hazmat employer is responsible for compliance with the requirements of this subchapter regardless of whether the training required by this subpart has been completed.

(d) Recordkeeping. A record of current training, inclusive of the preceding three years, in accordance with this section shall be created and retained by each hazmat employer for as long as that employee is employed by that employer as a hazmat employee and for 90 days thereafter. The record shall include:

(1) The hazmat employee's name;

(2) The most recent training completion date of the hazmat employee's training;

(3) A description, copy, or the location of the training materials used to meet the requirements in paragraph (a) of this section;

(4) The name and address of the person providing the training; and

(5) Certification that the hazmat employee has been trained and tested, as required by this subpart.

(e) Limitation. A hazmat employee who repairs, modifies, reconditions, or tests packagings as qualified for use in the transportation of hazardous materials, and who does not perform any other function subject to the requirements of this subchapter, is not subject to the safety training requirement of paragraph (a)(3) of this section.

[Amdt. 172-126, 57 FR 20952, May 15, 1992, as amended by Amdt. 172-126, 58 FR 5851, Jan. 22, 1993; Amdt. 172-145, 60 FR 49110, Sept. 21, 1995; Amdt. 172-149, 61 FR 27173, May 30, 1996]