



FGCU Hazardous Materials Shipping Procedure

Introduction:

Shipments of hazardous materials are regulated by several governmental and non-governmental organizations. Hazardous materials shipping regulations administered by the International Air Transport Association (IATA) and the US Department of Transportation (DOT) are the most comprehensive and widely applicable, however some shipping companies have developed specific rules, which are stricter than DOT and/or IATA regulations. Examples of these companies include the US Postal Service (USPS), Federal Express (FedEx) and United Postal Service (UPS). Penalties for non-compliance with regulations are significant and can result in:

- Up to \$250,000, and up to a year jail sentence for individuals.
- Up to \$500,000 per incident for organizations.

Individuals who are involved with the shipping process, including marking, labeling, packaging, preparing shipping documents, or signing for transport of a shipment including hazardous materials must receive Hazardous Materials Transportation Training. This training must be updated every three years for domestic ground shipments, and every two years for air shipments. Environmental Health and Safety (EH&S) employs staff with current Hazardous Materials Transportation training and is available to assist University personnel with training and shipping needs.

Definition of Hazardous Material:

A hazardous material is generally defined as any substance that could adversely affect the safety of the public or the environment, handlers or carriers during transportation. Hazardous materials, as defined by the DOT, are any substance that appears in the 49 CFR 172.101 Hazardous Materials Table. This table is searchable by clicking on the following link:

<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=9b912a795dcdd036cfd0654da044baf1&ty=HTML&h=L&mc=true&n=pt49.2.172&r=PART#sp49.2.172.b>

Hazardous material regulations may apply to commercial products, chemical mixtures, and newly synthesized compounds. Various types of batteries, fuel containers and cleaning products are examples of materials that are regulated for shipment.

How do I know if my shipment is covered by the regulations?

Materials that are shipped to a lab for testing or analysis, sent to a colleague for collaborative research, shipped to another research facility, returned to the manufacturer, or sent to a field research site must follow all applicable shipping requirements. To comply, regulated materials are classified according to their hazards, properly packaged, labeled, documented, and handled

by trained employees. Consult EH&S (239-590-1414) before shipping any chemical, biological, or radiological material.

Common hazardous materials in shipping include:

- laboratory chemicals
- radioactive materials
- compressed gases
- biological materials
- specimens
- instruments that contain hazardous materials

*Note- If you are shipping a hazardous material that is a commercially available product, it may be more cost-effective to purchase the material at the location to which you wish to ship it. For example, if you are planning field-work which requires the use of hazardous chemicals, you may find it easiest to have a vendor ship the chemicals directly to (or near) the location where you will be working.

General Requirements

- All hazardous materials must be sent and packaged by an FGCU employee.
- All shipments of hazardous materials to non-FGCU locations must be done by licensed commercial carriers subject to the hazardous materials regulatory requirements of 49 CFR Parts 171-180.
- Hazardous materials shipments by air have more restrictions than ground shipments. They should be avoided when feasible. EH&S may assist as a technical consultant for air shipments to the extent possible given proper notification. Depending on the type and quantity of material you are shipping, special packaging requirements may require you to contract directly with a vendor that specializes in turnkey hazardous materials shipping.

Procedures for Preparing Hazardous Materials for Shipment

Following these procedures will help to ensure that your package will arrive at its destination on time and intact. More importantly, it will ensure that everyone involved in the transport of the material will know what it is and how to safely handle it.

It is recommended that you submit your shipping request well in advance of the shipping date to avoid delays.

1. **Obtain required training.** Hazardous Materials Shipping Awareness is available on Canvas for FGCU.
2. **Contact the FGCU Research Compliance Coordinator for an Export Controls assessment of all international shipments.** An International Shipping form will need to be completed.
3. **Complete the online Domestic Shipping form** for Postal Services, if not shipping to an international address.
4. **Collect hazard information on the material to be shipped.** For chemicals, a safety data sheet must be included with the shipment.

5. **Ensure that the off-campus recipient has any necessary permits or authorizations to receive the material.**
6. **Package the material.** Ensure that a mailing label with the name and address of the sender and the recipient is attached to the package. Place appropriate markings and labels on the outside of the package. Do not seal the package because EH&S might need to inspect and approve all packages prior to shipment.
7. **Complete the online Hazardous Materials Shipment Information (HMSI) form** (available at www.fgcu.edu/ehs). EH&S representative will review and sign approval on bottom of form.
8. **Deliver all applicable forms** (HMSI, Domestic, International Shipping forms) **and package(s) to Postal Services once approved and instructed by EH&S.**
9. **Retain copies of paperwork for the duration of the shipment.**

Simplified Checklist of forms to accompany shipment

International Hazardous Material shipment

- 1. International Shipping Form for Export Control completed by Sender (Research & Sponsored Programs website)
- 2. Hazardous Materials Shipment Information (HMSI) form completed by Sender

Domestic Hazardous Materials shipment

- 1. Domestic Shipping Form completed by Sender (Postal Services website)
- 2. Hazardous Materials Shipment Information (HMSI) form completed by Sender

International Non-Hazardous Materials shipment

- 1. International Shipping Form for Export Control completed by Sender (Research & Sponsored Programs website)

Domestic Non-Hazardous Materials shipment

- 1. Domestic Shipping Form completed by Sender (Postal Services website)

Resources

49 CFR 173.4, <http://www.ecfr.gov>

IATA Dangerous Goods Regulations, <http://www.iata.org/publications/dgr/Pages/index.aspx>

Package Markings: www.shippinglabels.com; www.labelmaster.com