

Compliance with Federal Hazardous Materials Shipping Regulations

On 3/21/2014, Jack Hu, Ora Pescovitz, Martha Pollack, and Timothy Slottow sent the following message to deans, directors, and department heads:

In recent years, the University of Michigan has received several notices of violation of hazardous materials shipping regulations from the US Department of Transportation - Federal Aviation Administration (DOT-FAA). The most recent notice was received in the last two weeks; this recent incident was similar to those previous events. A package containing dry ice was found during a random inspection at the UPS sorting facility without the required identity of contents and proper labeling. Dry ice is regulated as a hazardous material when offered for shipment by air and as such has specific declaration, packaging, and labeling requirements to ensure it is moved safely. Dry ice presents hazards due to pressure buildup as it sublimates to carbon dioxide gas and it will displace oxygen in an area - both present a problem within a closed aircraft. We are sure you agree it is not acceptable for UM research operations to create a potentially hazardous condition for others in our community.

In earlier incidents the researchers who prepared the non-compliant packages for shipment were untrained and unaware of shipping requirements and associated paperwork. Since those earlier violations, the university has undertaken extensive outreach and training efforts to the campus community on issues of DOT-FAA compliance on packages and shipments of dry ice. We will continue those outreach and training efforts, and are currently vetting some possible service enhancements to assist with this problem, but it is imperative that everyone who may be shipping hazardous materials take responsibility for ensuring regulatory compliance. Financial penalties for failure to comply with hazardous materials shipping regulations have been severe in some cases, and the responsible units will be held liable.

Any campus employee, who intends to ship hazardous materials, including biological specimens with or without dry ice, must be trained on the appropriate methods of preparing packages, labeling, marking, and manifesting. This includes those who prepare paperwork for hazardous materials shipments and those who pack the parcels for shipment. Occupational Safety and Environmental Health (OSEH) offers certification training for shippers of hazardous materials, including dry ice. For questions or to sign up for training please contact OSEH at 647-1143 or www.oseh.umich.edu/research/shipping.shtml.

We urge you to share this message with all of your principal investigators, key staff members, research fellows and student research assistants who might ship regulated hazardous materials to help make them aware of this regulatory risk.