Environmental Health & Safety

Offsite Shipping (DOT)

UTK Environmental Health & Safety Guide HM-002

The purpose of this procedure is to provide a framework for those individuals on campus who ship and transport hazardous materials or dangerous goods for transport following all applicable DOT regulations.

Effective Date: 01/01/2009

Revision Date: 08/01/2015

Purpose

The purpose of this procedure is to provide a framework for those individuals on campus who ship and transport hazardous materials or dangerous goods for transport following all applicable DOT regulations.

Scope and Applicability

This shall apply to all students, staff and faculty on the UTK campus whenever hazardous materials are shipped or transported off-campus for various reasons. Some of these scenarios include:

- Sending/transporting items to a lab for testing or analysis, or to a colleague for collaborative research
- Sending/transporting specimen materials preserved in ethanol or another flammable solvent
- Sending/transporting any items on dry ice
- Returning items to a manufacturer
- Carrying an item with you when you travel (e.g. on an airplane)
- Sending/transporting hazardous waste for disposal

This standard applies to all “dangerous goods” and hazardous materials” as defined below.

NOTE: Radioactive materials, infectious agents, and animal or human diagnostic specimens are NOT regulated as hazardous materials/dangerous goods. They are NOT included in this survey because those
who ship these materials should already have authorization and training to ship such materials. If anyone who transports or ships these materials has NOT completed training/been granted approval by the Radiation Safety or the Biosafety Office, the applicable office must be contacted as soon as possible at the following phone numbers:

Radiation Safety Office: 865-974-5580;
Biosafety Office: 865-974-1938.

Abbreviations and Definitions

Abbreviations

CFR – Code of Federal Regulations
DOT – Department of Transportation
IATA – International Air Transport Association
ICAO – International Civil Aviation Organization
SDS – Safety Data Sheet

Definitions

Dangerous goods – articles or substances which are capable of posing a significant risk to health, safety, or to property when transported and are classified by ICAO or IATA as dangerous goods

Hazardous materials – “A substance or material that the Secretary of Transportation has determined is capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and has been designated as hazardous under section 5103 of the Federal Hazardous Materials Transportation law (49 U.S.C. 5103)”. Examples of transporting hazardous materials “in commerce” include: shipment via FedEx or UPS, transportation via public highways, waterways, air, etc.

Shipper – Any person who either prepares or offers a package containing hazardous materials for transportation on a public right-of-way. Preparing a hazardous material for transportation includes: classifying, packaging, marking, labeling, preparing shipping papers and affixing placards depending upon the hazards.

Roles and Responsibilities

Shippers:
Knoxville Campus Policy:
SAHM002-K - Offsite Shipping (DOT Shipping Guidelines)

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- Shippers: Shall be properly trained according to applicable DOT and/or IATA requirements before shipping any hazardous materials or dangerous goods for transport. There must be documentation of completed training.

- Must be responsible for accurately identifying the material and any known hazards associated with the item(s) and must follow all appropriate regulations.

- Understand that both the individual and the institution who ship such materials are subject to penalties and fines if these materials as shipped improperly due to lack of training, misclassification, inappropriate packaging, etc.

Department Heads/Employers who have Shippers under their control shall:

- Ensure that their employees are properly trained, following IATA and DOT regulations, to ship dangerous goods, and that their training is kept current.

- Ensure their employees are familiar with UT’s policy for transporting hazardous materials and dangerous goods for commerce.

EHS shall:

- Update UTK’s DOT dangerous goods and hazardous materials shipment procedure as necessary.

- Serve as a technical resource for questions and comments regarding the shipment of hazardous materials and dangerous goods.

- Assist with the shipment of hazardous materials and dangerous goods.

- Maintain appropriate training for EHS personnel, by meeting requirements specified in 49 CFR 172.700 (DOT) and ensure that training is kept up-to-date.

Hazardous Waste:

If you have any hazardous waste that needs disposed, please do not ship this waste. Please bring hazardous waste to the 90-day waste storage rooms on campus.

Hazardous waste should be brought to the following locations, or contact EHS at 974- 5084 to coordinate a pickup. Waste should never be left unattended outside the waste room.

Walters Waste room (Room M209):
Hours: The first and third Wednesday of every month, 12:45-1:45 p.m.
Knoxville Campus Policy: 
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SERF (Science & Engineering Research Facility) Waste room (at loading dock):
Hours: Every Wednesday, 2:00-3:00 p.m.

Additional Waste Rooms (JIAM, Strong, and Mossman) will be added in 2017-2018
Dates and times to be determined

Record Keeping

A record of training must be maintained, which includes: individual’s name; most recent training completion date; a description, copy of reference to training materials used to meet the training requirement; name and address of organization providing the training and evidence which shows the test was completed satisfactorily.

All shipping documents (i.e. manifests, bills of lading, air bills), and any other shipping documentation should be kept for a period of three years. A copy of any shipping documents involving dangerous goods and hazardous materials shipments should be provided to EHS. If the documents are kept electronically, or in the computer system, they should be capable of being reproduced in a printed manner.

Training and Information Requirements

EHS shall provide guidance to any shippers on campus to ensure they have been properly trained before handling and shipping hazardous materials and dangerous goods. If the department head has an employee who ships hazardous materials and/or dangerous goods on a regular basis, they need to send the employee to IATA and/or DOT training, based on their particular situation.

Individuals who are certified to ship dangerous goods by air must receive recurrent IATA training every 24 months. Individuals who are certified to ship hazardous materials must have recurrent DOT training every 3 years.

References

DOT: Department of Transportation (49 CFR)
IATA: Dangerous Goods Regulations
Disclaimer

The information provided in these guidelines is designed for educational use only and is not a substitute for specific training or experience.

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Appendices

HM-002 DOT Off-site Shipping (downloadable pdf of complete document)

Appendix A: DOT Hazard Class Table

Appendix B: Intent to Ship Chemicals Form