Legal Alert—Action Required—Transportation of Hazardous Materials

Problem:
The university has agreed to pay a fine of $5,000 to the FAA for failing to follow appropriate procedures relating to the shipment of a Honda generator by air. The FAA charged that a small generator was shipped with a small amount of gasoline left in the tank and fuel lines at the conclusion of its use in research. In the case of gasoline-powered engines, it is next to impossible to render them exempt from the regulations by draining them of fuel. This shipment was made without notifying the shipper of this hazardous material by properly filling out and filing required paperwork, and properly marking the box containing the generator.

Critical Information:
UAF is proud of the great volume of research and the variety of programs conducted within its system. This work involves the frequent procurement and distribution of materials to main and extended campuses, research stations, and field sites. Please be aware that shipping regulations are very complex and quite strict about any shipment of "hazardous materials," especially by air, but also by other modes. The term "hazardous materials" is quite broad and can often include non-intuitive types of materials including items such as seemingly empty containers or other general commodity type items in addition to the obvious hazardous materials. This institution has neither the resources nor the stomach to deal with an accident caused by our shipment of gasoline or other explosive, corrosive, or poisonous material.

Action Required
1. Designate persons authorized to prepare shipments of hazardous materials “Designated Shippers”:
   Deans and Directors of programs that offer shipments by commercial carrier must appoint “Designated Shippers” to approve all shipments that may contain a hazardous material. Designated Shippers must be trained to comply with hazardous materials shipping regulations, must possess current training certification, and must be approved by the environmental health and safety office. The Designated Shipper will sign, or individually authorize another to sign, all shipping manifests or declarations of dangerous goods.

2. Arrange for general awareness training for those who offer shipments:
   Because of the complexity of the shipping regulations and the great potential for harm, all Deans and Directors must ensure that all personnel who may ship anything by air, rail, truck, or vessel receive training as to: a) those items that may constitute "hazardous materials," b) the identity and role of Designated Shippers, and c) how to contact the appropriate environmental health and safety office. This training can be provided by either the designated shipper (from #1 above) or by your campus environmental health and safety office.

3. Return documentation of accomplishing the above required actions to Bill Krause, UAF Haz Mat Supervisor (Fax 5489; Email; bkrause@fs.uaf.edu) A Notification Form is attached to this Alert for this purpose. If you have any questions or concerns, please call UAF Environmental Health & Safety (phone 5413).

Attachments:

1. Legal Alert Notification – Documentation
2. UAF Hazardous Materials Shipment Request Form

File: Legal Alert - Action Required.doc