

HAZARDOUS MATERIAL FACT SHEET

Chemical Transportation

Chemicals are transported to, from and within the University of Nebraska Omaha for a variety of reasons. These reasons include sending chemicals to collaborating universities or companies, returning products to manufacturers, faculty shipping chemicals off-site to other institutions when accepting a new position, and when laboratories move from one building to another on-site. This document is to provide guidance when University employees wish to move chemicals.

A. Off-site Shipment of Chemicals

There are federal regulations governing the transportation of certain chemicals to other institutions off-site. Specifically, the U.S. Department of Transportation (D.O.T.) in 49 CFR regulates "The offering of hazardous materials for transportation and transportation of hazardous materials in interstate, intrastate, and foreign commerce by rail car, aircraft, motor vehicle, and vessel . . .". Thus anytime a chemical must be transported off-site to another institution, it may fall under the DOT's or the International Air Transport Association's (IATA) regulations.

1. If an employee wants to send a chemical to a collaborating institution or company, or return a chemical to the manufacturer, they should contact UNO Environmental Health and Safety (EHS) for help in determining if the chemical is regulated by DOT or IATA. Chemicals that are not regulated may be shipped by the employee. Chemicals that are regulated have to be shipped by EHS unless the employee can show that they have the proper DOT or IATA training. If chemicals will be transported internationally, you must complete the Export Controls Review Application: Export Control Review Form

In instances where the same thing is shipped on a continual basis it is better to have the employee trained to ship these items, i.e. Dry ice, Regulated medical waste, or Infectious substances. The employees' department will pay the shipping fees.

2. If an employee is separating from the University and plans to transfer chemicals to another institution, that employee must also comply with the attached memorandum "Employee Separation/Transfer of Chemicals." Those individuals planning to transport chemicals off-site should contact EHS at 554-3596 as early as possible. EHS personnel will provide you guidance and can be contracted to assist you in packaging, labeling and documenting each shipment. EHS will charge for this service with the cost depending on the quantity and type of chemicals and location to which they are shipped. Employees can also contact outside chemical shipping companies to perform these duties as long as EHS approves the outside shipping company.

Furniture moving companies cannot legally move regulated chemicals. Remember, since some chemicals have special requirements, the shipment could be delayed if EHS is contacted late, so plan in advance. In some cases, it may be cheaper to leave chemicals behind and tag them for disposal through EHS.

B. On-site Shipment of Chemicals

The DOT Hazardous Materials Regulations, 49 CFR Parts 171-180, are not applicable when hazardous materials are transported on public or private roads by a state agency or local jurisdiction for its own use, using its own personnel and vehicles under its control. It is not engaged in transportation "in commerce." Therefore, transporting chemicals within the UNMC system using UNMC employees and vehicles under its control is not regulated by outside agencies. Researchers do have several things to consider when they are moving their chemicals to a different on-site location.

- 1. Moving is an excellent time to go through chemicals and get rid of the chemicals that are expired, contaminated or no longer used. Submit a list of chemicals that you want to get rid of to EHS and they will advise you which chemicals should be tagged for disposal. EHS will try to help you get rid of your unwanted chemicals prior to your move.
- **2.** Pack the chemicals that are going to be moved in sturdy boxes. Make sure chemicals in the same box are compatible. Reference Hazardous Material Fact Sheet, <u>Chemical Collection Containers and Storage</u>, which includes a table of chemical compatibility. Examples of compatibility groups include:
 - Flammable liquids
 - Flammable solids
 - Oxidizers
 - Inorganic acids
 - Organic acids
 - Bases
 - Poisons
- 3. Contact EHS if you need help determining compatibility.
- **4.** Move your chemicals yourself using carts or University owned vehicles. **Chemicals cannot be moved by the furniture movers.** EHS can be contracted to provide this service for you. Cost will be dependent on the amount of chemicals and level of help requested. You can also contract with an outside chemical moving company, provided they have EHS approval. It is the researchers' responsibility to ensure that all chemicals are removed from the laboratory prior to the move deadline. The department will be charged for chemicals left behind.

Updated 04/2021