




UNIVERSITY
of HAWAII®
MĀNOA

July 23, 2008

MEMORANDUM

TO: Mānoa Deans and Directors

FROM: Gary K. Ostrander 
Vice Chancellor for Research and Graduate Education

SUBJECT: Transportation of Hazardous Material by University of Hawai'i Personnel

Research and teaching activities sometimes necessitate the transfer of apparently benign materials that may be deemed hazardous (e.g. certain types of water samples), as well as materials that pose an obvious hazard (e.g. certain radioactive compounds). In general, there are two sets of regulations which concern the transportation of hazardous material: *The United States Department of Transportation (DOT) Regulations for the Shipment of Hazardous Materials* and *the International Air Transport Association (IATA) Regulations for the Shipment of Dangerous Goods*. The applicable federal agencies enforce these regulations and twice in the past two years have found the University in violation because untrained personnel have improperly shipped hazardous materials.

DOT Regulations

DOT regulations apply to shipments of hazardous materials by all modes of transportation (i.e., highway, rail, vessel and air). DOT regulations are revised at least annually. These regulations are complex and their applicability depends on the type of material being shipped, its amount, its destination, and the mode of transportation employed. There are nine classes of hazardous materials under DOT regulations (explosives, compressed gasses, flammable liquids, flammable solids, oxidizers, poisons and infectious substances, radioactives and miscellaneous). There are four categories of shipments depending on the amount being shipped in a container (i.e. small quantity, excepted quantity, limited quantity and fully regulated quantity). The quantity category determines the type of packaging and the labeling required. The first task in determining the regulations applicable to a shipment is to select the proper shipping name for the material from among the over 3000 listed items which include a large number of generic names as well as specific chemical ones. If the list does not contain the name of the specific chemical involved, then a generic name must be selected based on knowledge of the hazards present in the material. The knowledge of the hazards of the material can be obtained from a material safety data sheet and a comparison of specific data with the regulations defining a specific hazard class. Once a proper shipping name has been determined then various tables or referenced sections in the regulations will provide information of the permitted amounts, packaging, and labeling.

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Should you not be aware of the details as described, you should contact Mr. Tim O'Callaghan, Hazardous Material Management Officer, at (808) 956-3198 or ocallagh@hawaii.edu

IATA Regulations

IATA regulations only apply to transportation of hazardous material (dangerous goods) by air. IATA regulations are revised annually. These regulations are more restrictive than DOT regulations in some cases and provide additional requirements (e.g. country and carrier variations, which are additional requirements issued by individual countries or airlines).

Additional Regulations

Additional regulations may apply to shipments for specific materials or destinations. Import/Export and Customs regulations may apply for international shipments. The shipment of biological commodities or agricultural products may require special licenses or permits. The shipment of controlled substances (narcotics, metabolic steroids), radioactive materials, hazardous wastes or explosives may require compliance with regulations invoked by the regulatory agencies which control these types of material.

Please distribute this important information to your faculty, staff, students, and any other individuals who should be aware of the procedures for the transportation of hazardous material. Again, Mr. Tim O'Callaghan, Hazardous Material Management Officer, at (808) 956-3198 or ocallagh@hawaii.edu can answer any questions you might have related to shipment of any materials that may be deemed hazardous

c: Jim Gaines, VP for Research
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Kathy Cutshaw, Vice Chancellor for Administration, Finance & Operations
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Tim O'Callaghan, Hazardous Material Management Officer, EHSO