

HAZMAT Shipment Awareness

1

For packages submitted for delivery to USPS, FedEx, UPS and other mailing services

How to identify?

2

There are several parameters that may identify your shipment as HAZMAT:

- One or more components or compounds have Department of Transportation (DOT) regulation description in Section 14 of that material's Safety Data Sheet (SDS);
 - To find any SDS online, search for the material or chemical followed by the name of the manufacturer and abbreviation SDS.
- It is a chemical that has a generic shipping name in Section 14 of the SDS;
- It is a piece of equipment with lithium or rechargeable batteries installed in the equipment (e.g., laptops, flow meters, portable pH meters, flying drones etc.);
- The contents of the samples may not be hazardous, but samples need to be preserved in dry ice for shipment;
- Samples are preserved in something like acetone, hexanes, nitric acid, sodium hydroxide etc.
- Materials can fall under the category of Materials of Trade (MOT) according to 49CFR 173.6. This can be insect repellent, spare gasoline, fire extinguisher etc.

If any description or a part of a description matches with what you need to ship, you may be dealing with HAZMAT shipment.

Next step

3

The proper next step to ship your package per DOT regulation will be:

- Seek immediate assistance of the WSU personnel with current HAZMAT shipment certification (contact information on last slide). Such assistance will be free of charge.
- To identify materials as HAZMAT, an active certification is required according to DOT 49 CFR 172.704 (c) (ii). It is illegal for anyone else to perform this task. Ignoring requirements of 49CFR Parts 100-185 can result in serious monetary penalties and consequences which may lead even to jail time.
- DOT regulation has a list of tasks which require proper certification. Full list is provided in 49 CFR 171.1 (b).

Any 49 CFR Parts 100-185 regulation listed or mentioned in these slides can be found online by entering and searching exact chapter and paragraph citation used here.

List of tasks that require HAZMAT certification based on DOT 49CFR 171.1 (b) regulation:

4

When your package is more likely to fall under the category of HAZMAT shipment, the next tasks can be performed only by a properly certified WSU personnel:

- Determining the hazard class of a hazardous material;
- Selecting hazardous materials packaging;
- Filling hazardous materials packaging;
- Securing a closure on filled or partially filled hazardous materials packaging;
- Marking a package to indicate that it contains a hazardous material;
- Labeling a package to indicate that it contains hazardous material;
- Preparing a shipping paper;
- Reviewing a shipping paper;
- Certifying (signing) shipping paper while confirming that hazardous material is packaged according to DOT regulation using proper packaging group, shipping name and provisions.
- If any of these tasks are performed without HAZMAT shipment certificate, the individual or unit are in violation of DOT regulation and potentially individually liable.
- This is not complete list of DOT regulated tasks that apply to HAZMAT shipment handling. The full list is in 49CFR 171.1 (b) under Pre-transportation functions.

What can happen if a person who is not certified ships a package from WSU which falls under the category of HAZMAT shipment?

5

- If your parcel gets picked up by FedEx, UPS, USPS or other mail carrier and breaks in their facility or shows signs of deterioration or leakage, the mail carrier will investigate. As soon as they suspect that the parcel contains undeclared HAZMAT, the incident will be reported to DOT.
- All mail carriers working in the United States are regulated by DOT and are obligated to report suspicions of undeclared HAZMAT in packages.
- DOT conducts further investigation and establishes that the parcel indeed contained HAZMAT that was not properly declared, labeled or marked.
- DOT applies fees for shipment of an undeclared HAZMAT and comes to a workplace from where it was shipped. Usually, it leads to further investigation and more fees. In some cases, criminal charges can follow (see more information on slide 7).

Note: People who are not properly trained are more likely to have their undeclared HAZMAT packages discovered.

If you would like more information, you can find list of Frequently Cited Violations in 49CFR 107.339 Appendix A Subpart D of Part 107 - Guidelines for Civil Penalties (II).

DOT Penalties and Fees for violation of 49CFR Parts 100-185

6

- Per each shipped box of undeclared HAZMAT, it is \$102,348.
- There is a cap for an individual who ships multiple parcels containing undeclared HAZMAT and it is \$238,809, but there is no such limit if undeclared HAZMAT was shipped in official capacity and on behalf of an organization such as WSU.
- When DOT continues investigation at the workplace of a person who shipped undeclared HAZMAT on behalf of an organization (for example WSU), the DOT will charge the organization (WSU) \$617 per day of employment of the individual (WSU employee) who shipped the package.
- Similar penalties are levied for historical shipments of suspected and/or undeclared HAZMAT discovered during the investigation.

All information provided in this slide is based on 49CFR 107.329 (a) that was updated on 3/20/2025 and can be found online.

DOT Criminal Penalties

7

- In case the shipment of undeclared HAZMAT led to damage of property, delays, closure, release of hazardous material, risk to someone's health or even death, the imprisonment can be between 5 to 10 years.

Source: 49 CFR 107.333

Appropriate process for possible HAZMAT shipment

8

- Seek immediate assistance from appropriately certified WSU personnel (see last slide):
 - If you ship your package by GROUND, a person only with HAZMAT shipment certification will be enough.
 - If you ship your package by air, both HAZMAT and IATA (International Air Transport Association) certificates are required. FAA (Federal Aviation Administration) adheres to IATA regulations even within the United States.
- WSU personnel with appropriate certification(s) first will evaluate your package to see if it is a subject to 49CFR Parts 100-185:
 - Only appropriately certified WSU personnel can assess your package and advise you how to pack your materials or samples in a way that those will satisfy 49CFR Parts 100-185 and how to ship your parcel safely and in timely matter.

Why Department of Transportation (DOT) is so strict?

9

- DOT does not want money for violations, but the fees need to be high to discourage people from ignoring requirements of 49 CFR Parts 100-185 code;
- A lot of parcels are shipped using routes shared with passenger vehicles or in passenger aircrafts. Undeclared HAZMAT is more likely to cause fire or other dangerous conditions;
- When HAZMAT is declared and/or shipped according to 49CFR Parts 100-185 regulations, it is far less likely to cause any incidents. Some HAZMAT can be shipped only in cargo aircrafts to avoid any danger, or it will need to be properly segregated during transport in case of an accident to avoid fire;
- Untrained people may not be fully aware of the damage that some HAZMAT materials can cause due to their lack of experience. Common sense alone is not enough for safe HAZMAT shipment. 49CFR Parts 100-185 are based on past incidents and other negative consequences with a sole purpose to avoid a disaster;
- The main goal of 49CFR Parts 100-185 is to protect public health and safety.

No price is too high for someone's health, well-being and life!

WSU contacts for proper HAZMAT identification, evaluation and shipment

10

- Office of Research Assurances (ORA):
 - Ryan Schwager rschwager@wsu.edu
 - Doug Cuellar dcuellar@wsu.edu
 - ORA Cell: (509) 432-3869
 - Email: ora.hazmatshipping@wsu.edu
 - Assistance with HAZMAT shipments by GROUND or AIR.
 - Same day requests for domestic shipments need to be submitted by 10 am on a business day and packages need to be ready for pickup by noon.
 - Requests for international shipment need to be submitted at least a day in advance and will not be shipped on a same day.

- Within VCEA:

Department of Civil and Environmental Engineering (CEE)

- Natalia Drumm natalia.drumm@wsu.edu
- Office phone: (509) 335-3351 (only during business hours)
- Assistance with identification and preparation for domestic (within United States) shipment ONLY by GROUND.

Other resources: [Instructions for Shipping](#)

Or you can search WSU Office of Research Assurances and find Instructions for Shipping

Prepared by
Natalia Drumm