SHIPPING POLICY FOR REGULATED MATERIALS

Scope

This policy ensures proper management and safety while preparing and loading materials for shipment. The work stated in this policy is intended to be for the Environmental Compliance Division (ECD) staff working at the Washington University School of Medicine Environmental Management Facility and the Danforth Campus Environmental Management Facility. Preparing and shipping items to be disposed of is the responsibility of the ECD staff working at the respective facilities. The ultimate responsibility of chemical shipment paperwork falls upon the Environmental Professional III unless otherwise assigned. All other shipments will be the responsibility of the Environmental Professional assigned the task.

Safety

When moving any material including drums and equipment, it is important for the safety of personnel and the environment that all criteria below are followed:

- Use proper lifting techniques
- Wear steel toed boots, safety glasses and lab coat.
- Be aware of pinch points
- Ensure the pathway is clear
- Make sure that the material is being moved in the most efficient and safest possible way.

When moving the containers to be shipped, it is important for the safety of personnel and the environment that all criteria below are followed:

- Ensure drum is tightly sealed according to closure instructions provided by the drum manufacturer
- Ensure the drum is in good condition and not leaking.
- Be aware of the danger of spillage.
- For metal drums:
  - Check upper chime for any metal spurs.
  - Wear leather gloves while moving.
Security

When shipping regulated material, it is important for security purposes that all items below are followed:

- All offsite shipments shall be consigned through a broker/vendor under contract with Washington University in St. Louis.
- All offsite shipments shall be scheduled directly with the broker/vendor. The material shall be transferred only to known broker personnel on scheduled dates. If an unknown individual arrives in the name of the broker/vendor, telephone verification of the individual being authorized by the broker shall occur prior to transferring any material.
- The identity of vendor/broker carrier or driver must be verified prior to material loading.
- Confirm with the driver the name of the consignee and the destination for the material before releasing shipments.

General Requirements

The following requirements apply to all shipment regardless of location or regulated material:

- Ensure all containers to be shipped are listed on the manifest or Bill of Lading (BOL).
- Ensure all containers are properly classified and named in accordance to 49 CFR 172.101 on the manifest or BOL.
- Ensure all containers are properly packaged according to 49 CFR 173.24.
- Ensure all containers are properly marked and labeled per 49 CFR 172.101.
- Ensure all containers listed on the manifest or BOL are loaded onto the truck.
- Ensure the driver has properly segregated the load for transport per 49 CFR 177.848.
- Ensure the load is properly secured and braced.
- Ensure the driver has the proper placards for the shipment per 49 CFR 172.504.

Site Specific Requirements for Washington University School of Medicine Environmental Management Facility

When chemical material is being shipped the following procedure must be followed to eliminate the possibility of a spill reaching the sewer.

- Drains near the dock area at the must be closed. These drains flow directly into Metropolitan Sewer District sewers when open.
The key used to close the drains is mounted to the left of the man door exiting the dock area.

The drain switch is located near the southeast corner of the loading dock. The switch is 17 feet away from the building and 4 feet 6 inches away from the east curb of the driveway. The lid is about 7 inches in diameter and is labeled “Sewer”.

To open and close:
- To close - open cover and place key on switch, turn clockwise. Turn until the key stops. This will take several turns. Replace the cover.
- To open after a shipment - open cover and place key on switch, turn counterclockwise. Turn until the key stops. This will take several turns. Replace the cover.