University of Pennsylvania Shipping Manual for Infectious Substances, Biological Materials, And DRY ICE





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Table of Contents

	Page
Part I	Introduction1
Δ	Purpose of shipping regulations 1
	What are "Dangerous Goods" and who regulates them?
	Classes of "Dangerous Goods"
	Mandatory training for shippers of all "Dangerous Goods"
Part II	How to Ship7
Δ.	Classification (What are you shipping?)8
2.1	1. Regulated biological material
	a. Infectious Substance, Category A
	b. Biological Substance, Category B
	c. Genetically Modified Organisms (GMOs) and Genetically Modified
	Micro-Organisms (GMMOs)
	2. Exceptions
	a. Exempt Patient Specimens
	b. Other non-regulated biological material
	3. Chemicals in Small Quantities 11
	a. Excepted Quantities (Shipping Dangerous Goods as
	Preservatives from Classes 3, 8 and 9)
	• Formalin 11
	b. De Minimis exception
	4. Infected or uninfected live animals 12
В.	UN Identification Number and Proper Shipping Name13
2.	1. Infectious substance, Category A
	2. Biological substance, Category B 13
	3. Dry Ice
	4. Genetically Modified Organisms (GMOs)
C	Packaging14
Ċ.	1. Infectious Substance, Category A14
	2. Biological Substance, Category B,
	3. Genetically Modified Organisms or Microorganisms (GMOs or GMMOs)
	4. Exempt Patient Specimens
	5. Other non-regulated biological material
	6. Excepted Quantities
	7. De Minimis exception
	8. Dry Ice (Carbon Dioxide, solid)
	9. Liquid Nitrogen
	10. Dry Shipper
	11. Overpacks
D.	Marking and Labeling
	1. Infectious Substance, Category A, PI 620
	2. Biological Substance, Category B, PI 650 21
	3. Genetically Modified Organisms or Microorganisms, PI 959
	4. Exempt Patient Specimens
	5. Biological material that fall under the OSHA Bloodborne Pathogen Standard
	6. Excepted Quantity
	7. De Minimis exception

	10. Examples of markings on shipping boxes 24 11. Flow chart for determining classification of biological material	
E.	Documentation 1. Shipper's Declaration for Dangerous Goods 2. Air Waybill	31
Part II	II Special Regulations	. 35
Α.	Select Agents	35
В.	 Import and Export of Biological Materials and Infectious Substances 1. Import and Export Permits 2. Export Control Laws	36 39 40
Part IV	V Shipping Company Limitations	41
Part V	Emergency Response	43
Part VI	I Summary	44

Tables

Table 1 (The Category A List)	45-46
Table 2 (Comparison of PI 620 and PI 650)	47
Table 3 (Summary of Shipping Information)	48
Table 4 (Select Agents & Toxins List)	49

Appendices

Appendix A (Manufacturers of Certified Shipping Containers)	51
Appendix B (UN Specifications and Performance Tests)	52
Appendix C (Diagram triple packaging and labeling)	53
Appendix D (Shippers Declaration for Dangerous Goods Form)	54
Appendix E (Export controls on biological and chemical materials)	55
Appendix F (Certification Statement template letter)	56

Part I. Introduction

A. Purpose of shipping regulations

Shipping regulations have been published by international and national regulators in order to provide procedures for the shipper by which articles and substances with hazardous properties can be safely transported by air or ground.

"Infectious substances are transported for a variety of different reasons, within countries and across international borders. It is incumbent upon shippers to ensure packaging and shipping conditions meet regulatory requirements to preserve the integrity of materials, and facilitate their timely arrival at destination." (*World Health Organization; Guidance on Regulations for the Transport of Infectious Substances*.)

B. What are "Dangerous Goods" and who regulates them?

Dangerous Goods are defined as "articles or substances which are capable of posing a significant risk to health, safety, property or the environment when transported by surface or air".

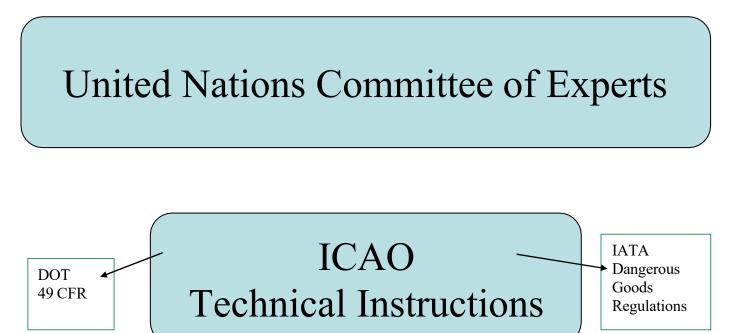
The recommendations for the transport of **Dangerous Goods** were first initiated to facilitate transport of those goods while ensuring the *safety* of people, property and the environment.

The United Nations publishes recommendations for packing and shipping **Dangerous Goods.** Although the International Civil Aviation Organization (**ICAO**) writes the technical instructions for the *Safe Transport of Dangerous Goods by Air*, the international community follows the **IATA** regulations.

The International Air Transport Association (**IATA**) is composed of the world's major airlines. They write the "IATA Dangerous Goods Regulations" which are based on the ICAO Technical Instructions. The IATA Dangerous Goods Regulations designate the **shipper** as having the responsibility for making sure all packaging is done properly.

The Department of Transportation (**DOT**) regulates the transport of "Hazardous Materials" in the United States. The Federal Regulations (49 CFR) also defer to the Technical Instructions from ICAO. DOT uses the term "Hazardous Materials" instead of "Dangerous Goods". Hazardous Materials are defined as a substance or material the Secretary of Transportation has determined as capable of posing an unreasonable risk to health, safety, and property when transported by commerce.

Structure Of Governmental Bodies

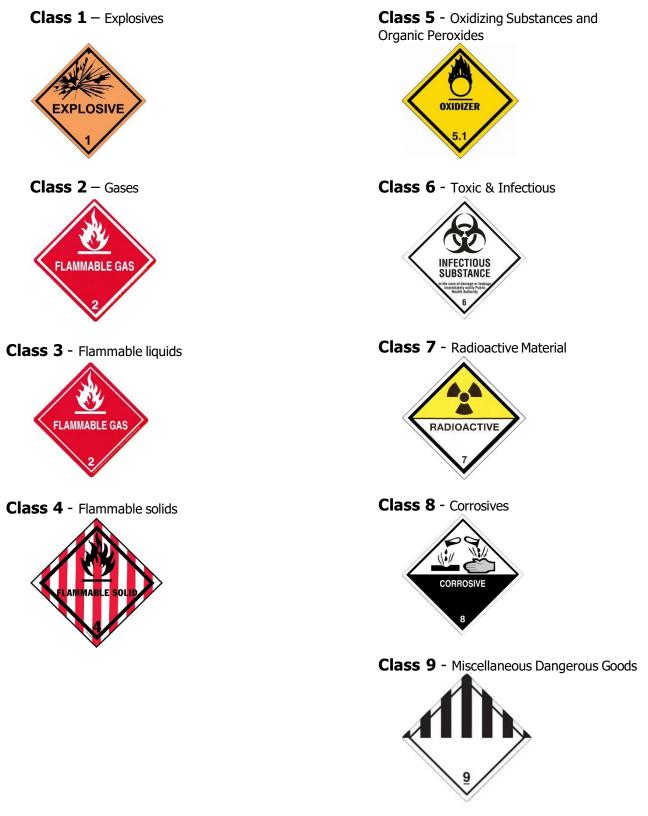


Some other agencies that may be involved with regulating packing and shipping are:

- Occupational Safety and Health Administration (OSHA)
- US Public Health Service (PHS)
- United States Postal Service (USPS)

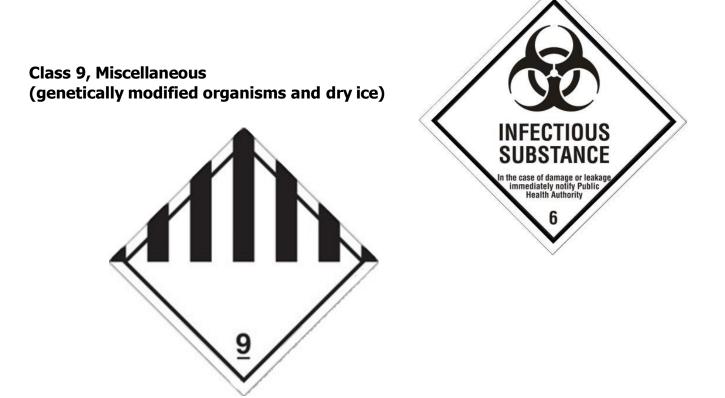
C. Classes of Dangerous Goods

• Dangerous goods are defined as those goods that meet the criteria of one or more of nine United Nations (UN) hazard classes. There are nine classes that relate to the type of hazard.



• The scope of this document is to provide guidance in transporting those Dangerous Goods that fall under Class 6 (specifically Infectious Substances, division 6.2) and Class 9 (specifically dry ice and genetically modified organisms).





This manual will discuss classification, shipping, packaging, and documentation regulations for sending the following items by ground or by air:

- Infectious substances (human and animal pathogens)
- Biological substances (human and animal pathogens)
- Genetically-modified materials
- Patient specimens (clinical human and animal)
- Exceptions of biological materials
- Biological products
- Dry Ice

D. Training is *mandatory* for anyone involved with the shipping of "Dangerous Goods".

A "shipper" is defined as someone that does any of the following jobs:

- Classifying material under IATA regulations
- Selecting packaging
- Marking and labeling packages
- Filling and securing packages
- Preparing and reviewing shipping papers
- Importing hazardous material
- Certifying proper transportation conditions

Training is an essential element in maintaining a safe regulatory regime. It is necessary for all individuals involved in the preparation or transport of dangerous goods to be properly trained to carry out these responsibilities prior to shipping.

Also, if you are a shipper, the carrier relies on your ability to properly package, label and declare goods.

It is the responsibility of the shipper to receive training on the proper packaging, documentation and shipping requirements in order to comply with the International Air Transport Association **(IATA)** and the Federal Department of Transportation (**DOT**). IATA requires training every two years for shipments by air and DOT requires training every three years.

The University of Pennsylvania's training requirements follow the IATA regulations for training. Therefore, shipping training must be updated every <u>24 MONTHS</u> and when there are significant changes made.

Check the EHRS website for notification of major changes to the IATA regulations.

Willful non-compliance to the IATA regulations can result in significant penalties and fines (2023 data):

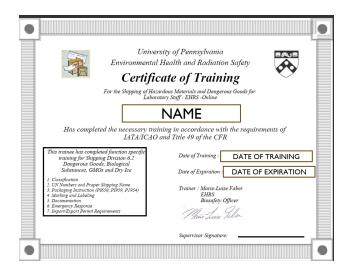
- Civil penalty not less than \$96,225
- Up to \$250,000 fine for individuals
- Up to \$500,000 fine per incident for organizations
- Possible 10-year prison sentence for individuals

Everyone intending to ship biological materials and/or dry ice must complete the appropriate training. Please go to EHRS website for specific instructions for the shipping training program. <u>https://ehrs.upenn.edu/health-safety/shipping/training-</u> <u>requirements-shippers</u>

Once you have completed the shipping training, you will have access to your shipping training certificate in <u>Penn WorkDay</u>. **Keep these** certificates in your personnel file for 24 months.

Accessing your shipping training certificate:

- In WorkDay, search for "IATA ONLY Customized Training Certificate" to access your certificate.



Additional training requirements:

If you will be shipping human source materials, you must **also** complete the **OSHA Bloodborne Pathogens Training**. This is offered online through WorkDay.



Preparing the package properly for shipping is *extremely* important!! Use the following steps to help you get ready to ship!

- A. Classification
- **B. UN Number and Proper Shipping Name**
- C. Packaging
- D. Marking and labeling
- **E.** Documentation

How to Ship - Classification

A. Classification (What are you shipping?)

- 1. Regulated biological materials:
- 1. Infectious Substance, Category A
- 2. Biological Substance, Category B
- 3. Genetically Modified Organisms or Microorganisms

2. Exceptions

- a. Exempt Patient Specimens (clinical human or animal samples)
- b. Other non-regulated biological material
- 3. Chemicals in small quantities
 - a. Excepted Quantities
 - b. De Minimis exception
- 4. Infected or uninfected live animals

1. **Regulated biological materials:** Class 6.2 Infectious Substances

Infectious Substances are materials which are known or are reasonably expected to contain an animal or human pathogen. Pathogens are defined as microorganisms (including bacteria, viruses, rickettsiae, parasites, fungi) and other agents such as prions or recombinant microorganisms, which can cause disease in humans or animals.

Infectious Substances are divided into sub-two categories, Category A and Category B.

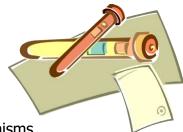
These categories are based on a detailed, case-by-case, risk assessment of microorganisms known to be pathogens. The categorization is the result of the consideration of scientific data concerning the **risks of transmission and infection posed during transport** of each species of microorganism.

a. Infectious Substance, Category A

An infectious substance which is transported in a form that, when exposure to it occurs, is capable of causing permanent disability, lifethreatening or fatal disease in otherwise healthy humans or animals. An exposure occurs when an infectious substance is released outside of the protective packaging, resulting in physical contact with humans or animals. Substances that meet this criteria can be found in the Category A List found in **Table 1**.

b. Biological Substance, Category B

An infectious substance that does not meet the criteria for inclusion in Category A. These are referred to as *Biological Substances*. These substances are or contain human or animal pathogens <u>not</u> included in the Category A List.



c. Genetically Modified Organisms (GMO) or Genetically Modified Microorganisms (GMMO)

GMO'S or GMMO'S are genetically modified **organisms** or **microorganisms** in which genetic material has been purposely altered through genetic engineering in a way that does not occur naturally.

If GMOs or GMMOs do NOT meet the definition of a toxic or infectious substance, they must be assigned to the category of Genetically Modified Organisms or Genetically Modified Microorganisms, UN3245. GMOs or GMMOs do NOT need to be classified as such when shipped within the United States.

Genetically modified live animals must be transported under terms and conditions of the appropriate national authorities of the States of origin and destination.

2. Exceptions

a. Exempt Patient Specimens (human and animal)

Patient specimens are materials, collected directly from humans or animal subjects, including, but not limited to, excreta, secreta, blood and its components, tissue and tissue fluid swabs, and body parts being transported for purposes such as research, diagnosis, investigational activities, disease treatment and prevention.

If patient specimens are not expected to be infectious, they are exempt; however, they must meet a minimum packing requirement which is basic triple packaging. Shipments must also be labeled "Exempt human specimen" or "Exempt animal specimen".

NOTE

In determining whether a patient specimen has a minimal likelihood that pathogens are present, an element of professional judgment is required to determine if a substance is exempt under this paragraph. That judgment should be based on the known medical history, symptoms and individual circumstances of the source, human or animal, and endemic local conditions. Examples of specimens which may be transported under this paragraph include the blood or urine tests to monitor cholesterol levels, blood glucose levels, hormone levels, or prostate specific antigens (PSA); tests required to monitor organ function such as heart, liver or kidney function for humans or animals with noninfectious diseases, or therapeutic drug monitoring; tests conducted for insurance or employment purposes and are intended to determine the presence of drugs or alcohol; pregnancy tests; biopsies to detect cancer; and antibody detection in humans or animals.

- Patient specimens may fall under Infectious Substance, Category A if they are known or reasonably expected to contain a pathogen from Table 1 or under Biological Substance, Category B if they are known or reasonably expected to contain a human or animal pathogen not found on Table 1.
- <u>CULTURES</u>: Set an internal protocol to determine if cultures are Exempt Patient Specimen, Category A, or Category B. This many be a visible change or a set time.

b. Other non-regulated biological material

(materials used only for research)

There are particular biological materials that are exempt from the shipping regulations. Exempted materials are not excluded from triple packaging. They are exempted from DOT and IATA regulations.

- Non-infectious biological materials derived from humans, animals or plants. Examples include:
 - o non-infectious cells (established cell-lines) or tissue cultures
 - DNA, RNA, or other genetic elements
 - o antibodies
 - plasmids (not infectious)
- Substances which do not contain infectious substances or substances which are unlikely to cause disease in humans or animals.
- Substances containing micro-organisms, which are non-pathogenic to humans or animals (i.e. Adeno-associated Virus (AAV), K-12 *E. coli* strains)
- Substances in a form that any present pathogens have been neutralized or inactivated such that they no longer pose a health risk.
- Environmental samples (including food and water samples), which are not considered to pose a significant risk of infection, are not subject to these regulations unless they meet the criteria for inclusion in another class.
- Dried blood spots.
- Fecal occult blood screening test.
- Blood or blood components which have been collected for the purpose of transfusion or the preparation of blood products to be used for transfusion or transplantation.
- Biological products including an experimental or investigational product or component of a product, subject to federal approval, permit, review or licensing requirements such as those required by the Food and Drug Administration or the USDA.
- Licensed vaccines
- Organs for transplant (transported by private courier)

3. Chemicals in small quantities

a. Excepted Quantities

Shipping small quantities of certain chemicals used as preservatives can be shipped under the limitation of Excepted Quantities in volumes less than 30ml in the primary container and less than 500ml in the package.

* Consult with EHRS Dangerous Goods Shipping team to ensure your preservative can be shipped under Excepted Quantities.

Examples of Preservatives shipped in Excepted Quantities:

Acetone (Class 3) Ethanol or Ethanol solution (Class 3) Alcohols, n.o.s. (Class 3) Formaldehyde >25% (Class 8) Acetic Acid (Class 8) Sodium Fluoride (Class 6.1)

Follow all required packaging and labeling for Excepted Quantites, as stated in this manual.



Formalin

Formalin is a mixture of formaldehyde and methyl alcohol. IATA identifies formalin as Formaldehyde solution:

- Full strength formalin contains 35-40% formaldehyde. A formaline solution with >25% Formaldehyde is classified as "Formaldehyde solution, flammable, UN1198" This must be shipped as a Dangerous Good with Shippers Declaration!
- Formalin with >10% but <25% formaldehyde is classified as "Aviation regulated liquid, n.o.s, UN3334" for transportation by air. *This must be shipped as a Dangerous Good!*
- Formalin with < 10% formaldehyde (< 25% formalin in solution) is **NOT REGULATED** for transport by highway or air.

Ensure your package of liquids DOES NOT LEAK!

If the volume of preservative for the **primary container** exceed **30ml** and/or the **total amount exceeds 500ml**, please contact EHRS to help ship. These amounts fall out of the "excepted and "exempt" amounts.

b. De Minimis exception

Hazardous materials subject to the de minimis exception are limited to certain Hazard Classes and Divisions:

*consult with EHRS DG Shipping to correctly classify De Minimis chemicals

- Non-flammable, non-toxic gases (Division 2.2) without subsidiary risks
- Flammable liquids (Class 3)
- Flammable solids (Class 4) in Packing Groups II and III
- Oxidizing substances (Division 5.1) in Packing Groups II and III
- Organic peroxides (Division 5.2) only when a kit component
- Toxic substance (Division 6.1)
- Corrosive substances (Class 8)
- Miscellaneous dangerous goods (Class 9) and all articles

The maximum quantity per inner receptacle or article is limited to one (1) mL for liquids **or...** one (1) g for solids

The maximum quantity per outer packaging does not exceed one hundred (100) mL for liquids or one hundred (100) g for solids

4. Infected or Uninfected Live Animals

The shipment of infected animals must not be transported by air unless specific regulations are met. The shipment of any live animals must meet AAALAC standards and IATA's Live Animal Regulations. Contact ULAR with any questions concerning the transport of live animals. Also, any animals transported to other states must be done under the terms and conditions approved by APHIS and USDA.

2 Make sure that you correctly classify the material to be shipped. Packaging, marking and documentation will depend on proper classification!

B. UN Identification Number and Proper Shipping Name

Dangerous goods are assigned to UN numbers and proper shipping names according to their hazard classification and their composition.

Specific wording is used for the terms Infectious Substance, Category A; Biological Substance, Category B; and Carbon Dioxide, solid or "Dry Ice".

1. Infectious Substance, Category A is assigned either UN 2814 or UN 2900:

UN 2814 is used for infectious substances that are considered human pathogens only or pathogens that infect humans and animals.

The proper shipping name for UN 2814 must be written as:

- *"Infectious substance, affecting humans (name of pathogen)".*
 - *Example:* Infectious substance, affecting humans (Hepatitis B virus).

UN 2900 is used for infectious substances that are considered pathogens for animals only.

The proper shipping name for UN 2900 must be written as: "*Infectious substance, affecting animals (name of pathogen)".*

- Example: Infectious substance, affecting animals (Vesicular stomatitis virus).
- Biological Substance, Category B is assigned UN 3373: The proper shipping name for UN 3373 must be written as: "Biological substance, Category B".
- 3. Dry Ice or Carbon Dioxide, solid is assigned UN 1845. The proper shipping name for UN 1845 must be written as: "Dry Ice" or "Carbon dioxide, solid".
- Genetically Modified Organisms (GMO) are assigned UN 3245. The proper shipping name for GMO's must be written as: "Genetically modified organisms" or "Genetically modified microorganisms".

* other classifications of biological material, such as exempt patient specimen or biological material, are not proper names and, therefore, do not have a UN number

C. Packaging

Follow the Packaging Instructions (PI)

All potentially hazardous biological materials must be packaged to withstand leakage of contents, shocks, temperature, pressure changes and other conditions that can occur during ordinary handling in transportation. **Please refer to Appendix A for vendors that supply certified packaging for biological materials.** When ordering, specify what category of material you will be shipping: *Infectious substance, Category A or Biological substance, Category B, Dry Ice, etc.* Different categories have slightly different packaging requirements as specified in the IATA Packaging Instructions, but

all follow the basic triple packaging requirements (Appendix C).

1. Infectious Substance, Category A

IATA Packaging Instruction (PI) 620 must be used for Category A packages. These requirements ensure that packages will arrive at their destination in good condition and present no hazard to persons or animals during transport.

PI 620

- Triple packaging (see Appendix C)
 - Primary receptacle*
 - Must be leakproof
 - Must be labeled with the name of the contents.
 - Secondary container*
 - Must be leakproof
 - Must meet UN performance standards for PI 650 (Table 2)
 - Must withstand an internal pressure of 95kPa
 - Absorbent material must be included in sufficient quantity to absorb the entire contents of all primary receptacles. This is placed between the primary receptacle and the secondary packaging.
 - If multiple fragile primary receptacles are placed in a single secondary packaging, they shall be either individually wrapped or separated so as to prevent contact between them.
 - Rigid outer container
 - Must be certified with a *UN specification mark. This will be marked on the box.* (Appendix B)
 - An itemized list of contents must be enclosed between the secondary and outer container.
 - The maximum quantity of infectious material that can be shipped by air in one package is 4L or 4kg.
 - * The maximum quantity of infectious material that can be shipped via passenger aircraft is 50mL or 50g.
- When shipping infectious substances, you are required to use one manufacturer's packaging system. Using one manufacturer's secondary container in different manufacturer's outer box can be dangerous and is illegal since it may not meet the required performance standard for the packaging.

How to Ship – Packaging

2. Biological Substance, Category B

IATA Packaging Instruction (PI) 650 must be used for Category B packages. These requirements ensure that packages will arrive at their destination in good condition and present no hazard to persons or animals during transport.

PI 650

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- Triple packaging (see Appendix C for graphic)
 - Primary receptacle*
 - Must be leak proof
 - Packaging containing liquids, closures of primary containers are required to be held securely by secondary means, such as adhesive tape, or friction sleeves.
 - Must not contain more than 1L or 1kg, if substance is liquid
 - Secondary container
 - Must be leak proof
 - Must meet UN performance standards for PI 650 (Table 2)
 - Must withstand an internal pressure of 95kPa
 - Absorbent material of sufficient quantity to absorb the entire contents of the primary receptacle.
 - Rigid outer container
 - Must not contain more an 4L or 4kg
 - Good quality, strong enough to withstand the shipping process
 - An itemized list of contents must be enclosed between the secondary and outer container.

* Primary receptacles must be packed in secondary containers in such a way that, under normal conditions of transport, they cannot break, be punctured or leak their contents into the secondary packaging.

3. Genetically Modified Organisms or Microorganisms (GMOs or GMMOs)

PI 959

- If the GMO or GMMO meets neither of the Category A or Category B criteria, it is classified as a GMO or GMMO UN3245 using the Packing Instruction 959.
- Primary receptacle and secondary packaging must be leak proof
- Absorbent must be placed between the primary receptacle and secondary packaging, of sufficient quantity to absorb the entire contents of the primary receptacle.
- Primary receptacle and secondary packaging must maintain integrity at various temperatures and pressures.
- Rigid outer container of good quality, strong enough to withstand the shipping process

4. Exempt Patient Specimens

No Packaging Instructions!

Patient specimens for which there is minimal or no likelihood that pathogens are present must be packaged according to IATA 3.6.2.2.3.8 as stated below:

A. EXEMPT ANIMAL/HUMAN SPECIMEN must be written on the outside of the box

- B. The packaging must meet the follow requirements:
 - 1. Leak-proof primary receptacle
 - 2. Leak-proof secondary packaging
 - 3. Outer packaging of adequate strength for weight of package
 - 4. Package larger than 100mm x 100mm surface
 - 5. Enough absorbent material to absorb entire liquid content, between primary and secondary packaging
 - 6. Ensure specimen are secure within the package

For liquids, absorbent material in sufficient quantity to absorb the entire contents must be placed between the primary receptacle(s) and the secondary packaging so that, during transport, any release or leak of a liquid substance will not reach the outer packaging and will not compromise the integrity of the cushioning material.

Individual primary containers must be secured to prevent braking during transport.

5. Other non-regulated biological material

No Packaging Instructions! Use triple packaging.

- A. The packaging must consist of three components:
 - 1. a leakproof primary receptacle(s)
 - 2. a leakproof secondary packaging

3. An outer packaging of adequate strength for its capacity, mass and intended use, and with at least one surface having minimum dimensions of 100 mm x 100 mm (4in X 4in).

B. For liquids, absorbent material in sufficient quantity to absorb the entire contents must be placed between the primary receptacle(s) and the secondary packaging so that, during transport, any release or leak of a liquid substance will not reach the outer packaging and will not compromise the integrity of the cushioning material.

C. Individual primary containers must be secured to prevent braking during transport.

6. Excepted Quantities

Packaging for qualifying materials and quantities must be packed in strong, ridged outer package.

- Inner packaging must contain the material during transport and be leakproof.
- Primary receptacle must be made of plastic greater than 0.2mm thick
- Primary containers must be securely packed with cushioning
- Closures of primary receptacle must be held securely in place with tape, wire, or other positive means. Screw cap containers must be leakproof..
- Primary receptacle must be secured in intermediate packaging along with enough absorbent to absorb all of the liquid within the primary receptacle
- The primary receptacle must not exceed **30ml** and the outer package must not exceed **500 ml** of liquid.

7. De Minimis exception

Packaging for qualifying materials and quantities must be packed in sturdy packaging

- The primary receptacle must not exceed 1ml and the outer package must not exceed 100 ml of liquid.
- Primary receptacle must be secured with cushioning material
- Include sufficient absorbent material to contain all liquid
- Outer packaging must be in a strong rigid container

8. Dry Ice (Carbon Dioxide, solid)

PI 954

If shipping dry ice, outer packaging must:

- allow for the release of carbon dioxide gas when the solid sublimates
- be ridged and withstand the shipping process
- be of adequate strength for the weight of the package

Styrofoam box is not approved UN specification packaging and is not allowed to be used at the outer shipping container

If shipping dry ice, inner packaging must:

- permit the release of Carbon Dioxide (CO2) to prevent rupture of the packing material
- be made of compatible packaging. A Styrofoam insert must sit inside a sturdy cardboard sleeve.

Do NOT tape down the lid to the Styrofoam box!

Dry ice must be placed outside the secondary packaging. Interior supports must be provided to secure the secondary container as the refrigerant sublimates.

Dry ice is considered a miscellaneous hazard (Class 9) by IATA. Packages containing dry ice must bear a Class 9 label and be marked with the proper shipping name, UN number, and net quantity, (e.g., Dry Ice, UN 1845, 3 kg).

A Shippers Declaration for Dangerous Goods is not required for shipments in which dry ice is the only hazardous material. Always include dry ice on the Declaration for shipments that include other hazardous materials, such as Infectious Substances.

9. Liquid Nitrogen

PI 202 (for open and closed cryogenic receptacles)

Specimens being shipped with liquid nitrogen are regulated and the liquid nitrogen is a dangerous good. This will need to be shipped as UN1977 Nitrogen, refrigerated liquid.

> Please contact EHRS if you will be using liquid nitrogen!

10. Dry Shipper

Follow Special Provision A152 – "not restricted"

Biological materials can be shipped refrigerated in dry shippers. These are insulated packages containing refrigerated liquid nitrogen fully absorbed in a porous filter within the shipper. These shippers are not regulated in and of themselves but must be designated with the special provision A152.

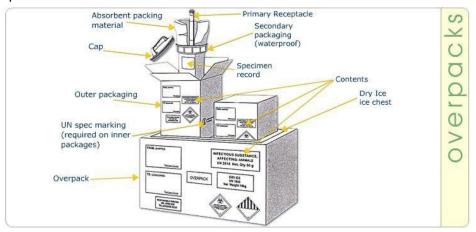


11. Overpacks

An overpack can be used to combine several triple packages into one large package. This may be done to save freight charges when shipping multiple samples.

Each triple package inside the overpack must be properly marked and labeled. The outside of the overpack must bear the same markings and labels as the triple packages within including hazard labels, proper shipping names and net quantities.

The outer container of the overpack must also be marked with the word "Overpack". The overpack marking is an indication that packages contained within comply with prescribed specifications.



D. Marking and Labeling

1. Infectious Substance, Category A, PI 620

The outer container must display the following information:

- Sender (shipper) and recipient's (consignee) full name, address and telephone number
- Name and phone number of responsible person (may be shipper, consignee, or third party knowledgeable about the shipment)
- "This End Up" or up arrows marked on two opposite sides
- UN certification seal (printed on box by vendor)
- Class 9 label (Fig. 2), UN 1845, proper name "Dry Ice", and weight of dry ice in kg (if packaged with dry ice)
- Infectious Substance, Class 6.2 label (Fig. 3)
- Proper shipping name "Infectious substance, affecting humans" or "Infectious substance, affecting animals"
- UN number and net quantity of infectious substance, min 6mm font *,**
- Cargo aircraft label if shipping over 50mL or 50g, min 120mm x 110mm edge to edge (Fig. 4)
- Labels must be of "durable quality"



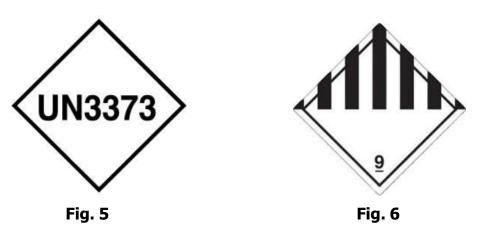
*Shippers of Category A infectious substances shall omit the technical name from the proper shipping name marking on the outside of the package (<u>Infectious substance, affecting humans</u> is the proper shipping name, <u>Ebola virus</u> is the technical name). **Example: "Infectious substance, affecting humans**"

******When the infectious substances to be transported are unknown but suspected of meeting the criteria for inclusion in Category A, they must be assigned to UN 2814 or UN 2900. The words "Suspected Category A Infectious Substance" must be shown in parentheses following the proper shipping name on the itemized list of contents inside the outer packaging and on the Shipper's Declaration for Dangerous Goods, but **not** on the outer packaging. **Example: Infectious substance affecting humans, (Suspected Category A Infectious substance)**

2. Biological Substance, Category B, PI 650

The outer container must display the following information:

- Sender (shipper) and recipient's (consignee) full name, address and telephone number
- Name and phone number of responsible person (may be shipper, consignee, or third party knowledgeable about the shipment) may be provided on the air waybill or on the package
- Proper name "Biological substance, Category B", min 6mm font
- UN 3373 diamond, 2 mm thick boarder, min 6mm font, min 50mm point to point (Fig. 5)
- Class 9 label (Fig. 2), UN 1845, proper name "Dry Ice", and weight of dry ice in kg (if packaged with dry ice) (Fig. 6)
- Labels must be of "durable quality"



> Net quantity of agent is not required on outside of Category B packages.

3. Genetically Modified Organisms or Microorganisms, PI 959

The outer container must display the following information:

- Sender (shipper) and recipient's (consignee) full name and address
- UN 3245 diamond, 2 mm thick boarder, min 6mm font, min 50mm point to point (Fig. 7)
- Labels must be of "durable quality"
 - Proper name is not required to be printed on the outside of the package

4. Exempt Patient Specimens

The outer container must display the following information: "Exempt Human Specimen" or "Exempt Animal Specimen", as appropriate.





5. Biological material that fall under the OSHA Bloodborne Pathogen Standard

Do not place any markings on the outside of the box. Use the Biohazard Symbol ONLY on primary container. OSHA requires the biohazard symbol to be on the primary container.

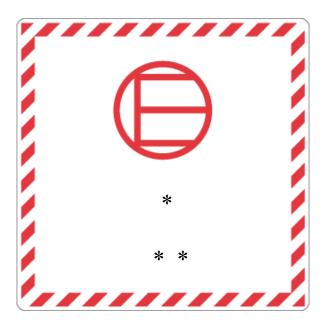
> Do not place any markings o the outside of the box for other exempt, noninfectious biological material as well

6. Excepted Quantity

- **1.** If shipping with an Infectious substance, Category A or Biological substance, Category B, **there are no further labeling requirements for Excepted Quantity.**
- 2. If not shipping Infectious substance, Category A or Biological substance, Category B, must use the designated label below:

Excepted Quantity label:

- Label must be a minimum of 100mm on each side.
- Labels must be of "durable quality"



* Mark this area with the hazard class or, when assigned, the division number(s). For example, if using alcohol, class 3 would be indicated by writing 3 in place of *. Hazard classes can be found in Section 14 of the Safety Data Sheet.

* If the name of the shipper or consignee is not shown elsewhere on the package, place it here in place of **.

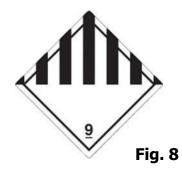
7. De Minimis exception

Do not place any markings on the outside of the box.

8. Dry Ice or Carbon Dioxide, solid, PI 954

The outer container must display the following information:

- Class 9 label (Fig. 8), UN 1845, proper name "Dry Ice", and weight of dry ice in kg
- Labels must be in the form of a square set at an angle of 45° (diamond shape)
- Minimum dimensions must be 100 x 100 mm point to point
- The line inside the edge must be parallel and 5mm from the outside of that line to the edge of the label.
- Labels must be of "durable quality"
- "This End Up" or up arrows marked on two opposite sides





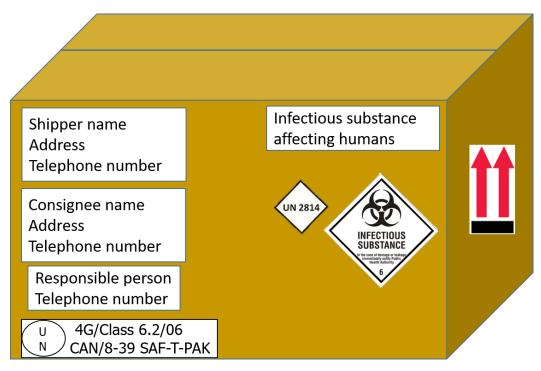
Font type for "DRY ICE"	٦
- > 30 kg – 12 mm type	
- 5-30 kg Dry Ice – 6 mm type	
<pre>- < 5 kg - adequate size</pre>	:
L	-

9. Other non-regulated biological material

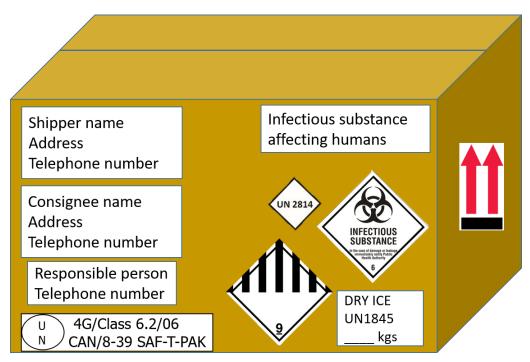
Do not place any markings on the outside of the box.

10. Examples of Markings on Shipping Boxes

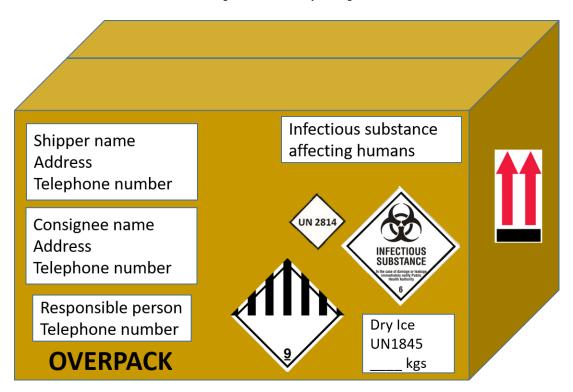




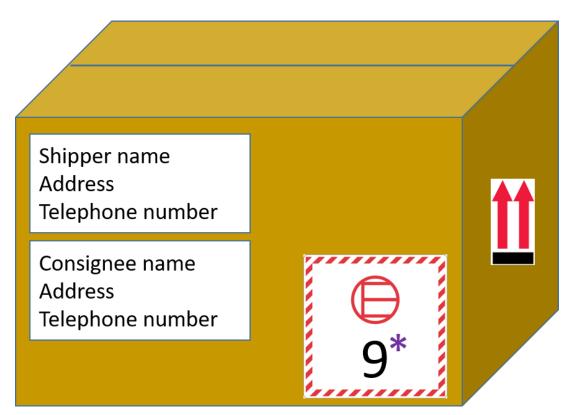
Outer Box for Infectious substance, affecting humans with Dry Ice

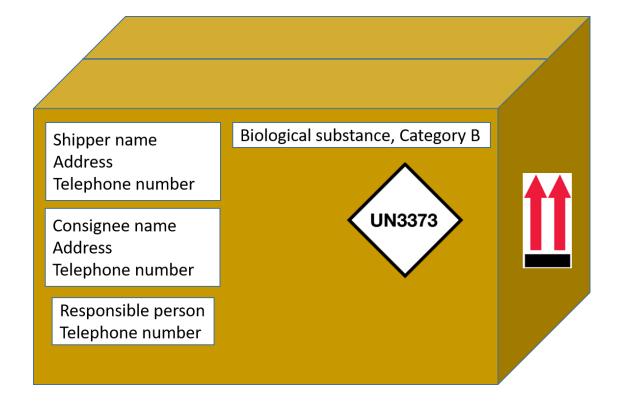


Infectious substance, affecting humans (in an Overpack)



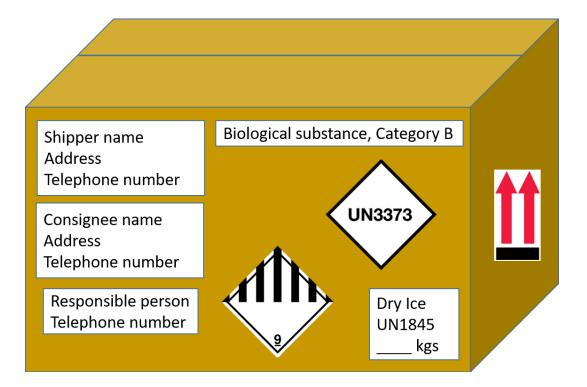
Outer Box for Excepted Quantity





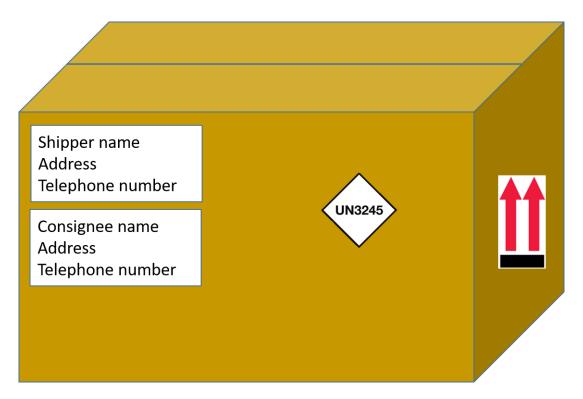
Outer Box for "Biological substance, Category B" without Dry Ice

Outer Box for "Biological substance, Category B" with Dry Ice



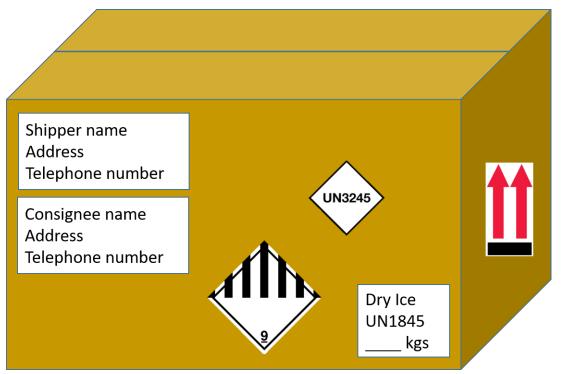
Outer Box for Genetically Modified Organism without Dry Ice

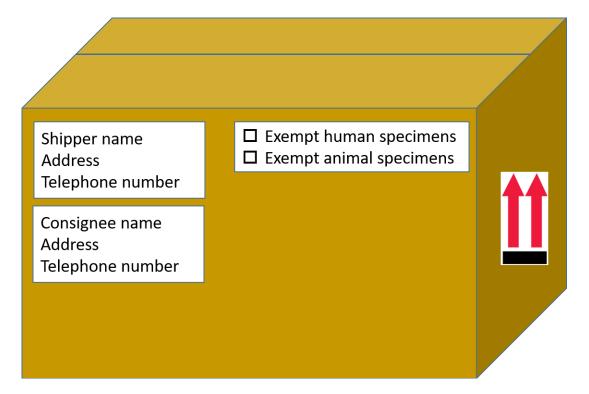
(for International, non-Cat A or Cat B shipments ONLY!)



Outer Box for Genetically Modified Organism with Dry Ice

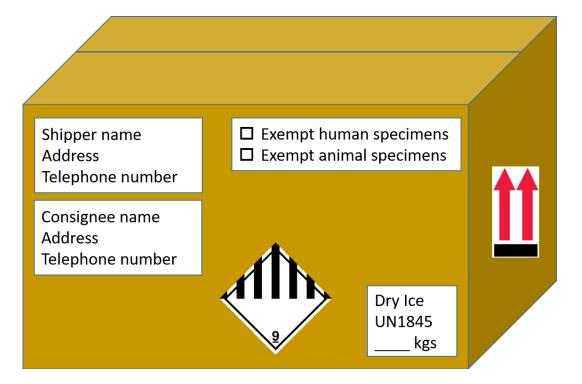
(for International, non-Cat A or Cat B shipments ONLY!)

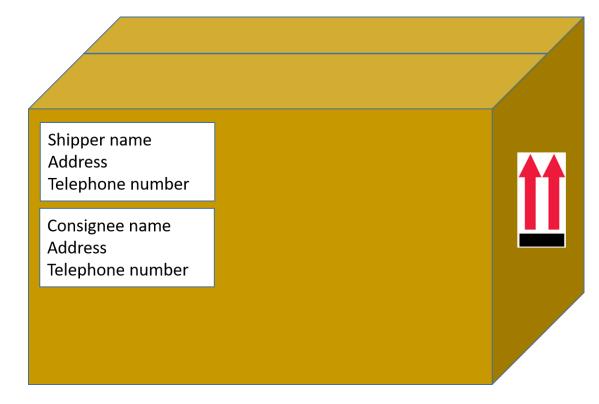




Outer Box for Exempt Patient Specimens without Dry Ice

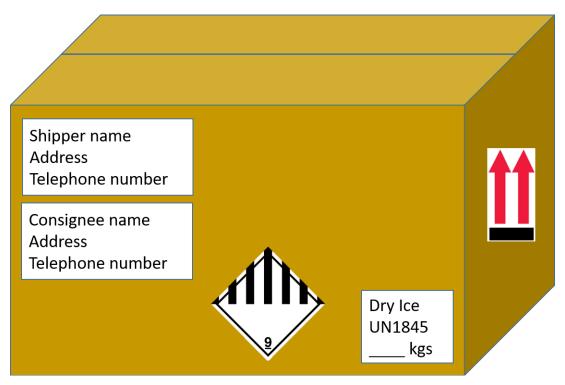
Outer Box for Exempt Patient Specimens with Dry Ice

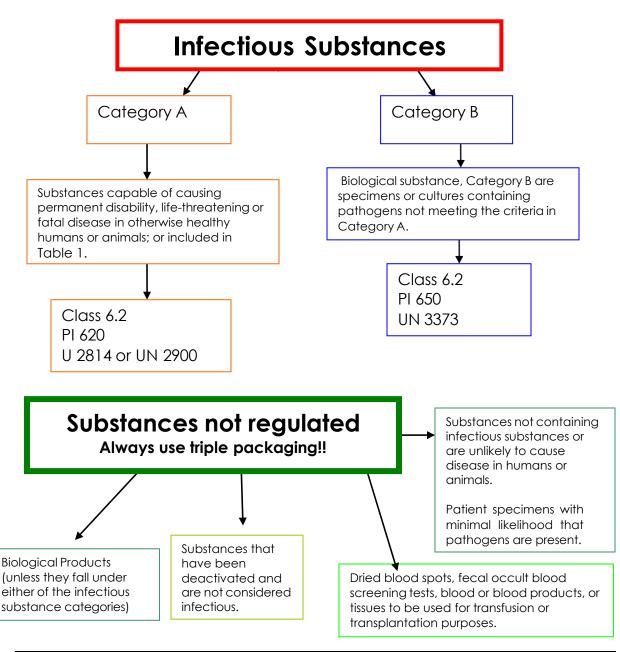




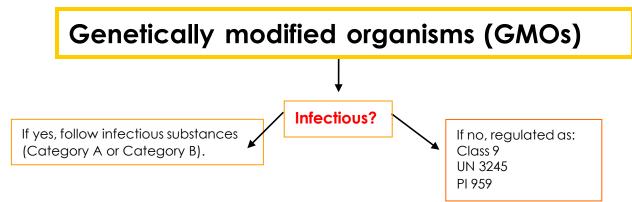
Outer Box for Other non-regulated biological material

Outer Box for Other non-regulated biological material





11. Flow Chart for Determining Classification of Biological Material



E. Documentation

The proper declaration of dangerous goods by the shipper insures that all in the transportation chain know what kind of dangerous goods they are transporting, how to properly load and handle them and what to do if an incident or accident occurs either in flight or on the ground.



Required Documentation: For the IATA regulations, a "Shipper's Declaration for Dangerous Goods" form and an "Air Waybill" must be completed for each consignment of dangerous goods.

All completed Shipper's Declaration forms <u>must</u> be FAXed (215-898-0140) or emailed to EHRS (<u>SHIPPINGDG@LISTS.UPENN.EDU</u>) for approval <u>before</u> the package is shipped! This is to ensure the declaration is completed correctly and the information is accurate. *If using eShip, we will be notified automatically.* Please contact EHRS at 215-898-4453 with any questions regarding the completion of the Shippers Declaration for Dangerous Goods.

1. Shippers Declaration for Dangerous Goods

- > If using eShip, a Shippers Declaration will be generated automatically
 - A Shippers Declaration for Dangerous Goods must be completed when shipping a Category A Infectious Substance assigned to UN 2814 or UN 2900.
 - The red hatching on the Shippers Declaration for Dangerous Goods is an indication that the item being shipped is a Dangerous Good. Forms for domestic and international transport are different.
 - A Shippers Declaration for Dangerous Goods is not required for shipments of Biological Substance, Category B assigned to UN 3373, shipments containing ONLY dry ice, and shipments with Excepted Quantities.
 - Declarations must be typewritten or computer-generated; handwritten declarations will not be accepted.
 - Always print at least four copies: provide three to the carrier and keep one for your records for 2 years.
 - Remember to sign and date each copy.
 - A completed sample of a shipper's declaration can be found in Appendix D.

Regulations require that you must retain your copy of the Shippers Declaration for 2 years.

Important!!! Improperly completed shipper's declarations are the most common cause of package refusal. The Shipper's Declaration must be:

- Accurate
 Complete
- Legible
 Unaltered

A change may be made on the form only if it is signed by the shipper with a full signature. No whiteout is allowed!

The following is an explanation for each section appearing on the "Shippers Declaration for Dangerous Goods" form: (Appendix D)

a. **Shipper:** Enter the full name, address and telephone number of the person packing this shipment. THIS PERSON MUST BE TRAINED! The address must also include the University of Pennsylvania.

Example:	University of Pennsylvania
	Jenna Brown
	215-746-6666
	1234 Research Blvd
	Microbiology Laboratory
	Philadelphia, PA 19104

b. **Consignee:** Enter full name, address, and phone number of recipient.

Example:	Mycology Laboratory Dr. Sal M Nela
	654-213-8476
	University of Florida
	Gainesville, FL 21345

- c. **Transport Details:** Indicate here if your shipment is restricted to cargo aircraft only (if it is more than 50 ml or 50 g of an Infectious Substance). Airport of departure and airport of destination will be filled out by the carrier, leave blank.
- d. **Shipment Type:** Cross out "Radioactive" to indicate the shipment of a non-radioactive substance. If radioactive you must contact EHRS 215-898-7187 for additional instructions.
- e. **UN or ID Number:** Enter appropriate UN number as found in Table 3.
- f. **Proper Shipping Name:** Enter the proper shipping name exactly as it appears in Table 3. When the infectious substances to be transported are unknown but suspected of meeting the criteria for inclusion in Category A and assignment to UN 2814 or UN 2900, the words "Suspected Category A Infectious Substance" must be shown in parentheses following the proper shipping name.

Example: Infectious substance, affecting humans (Suspected Category A Infectious Substance) OR

Infectious substance, affecting humans (Hendra Virus)

- g. Class or Division: Enter appropriate hazard class as found in Table 3.
- h. **Packing Group:** For Dry Ice, enter "III" in this column. Infectious substances are not assigned packing groups.

i. Quantity and Type of Packaging: Enter the net quantity for each material here. Use only *metric* units. At the bottom of the column, indicate the number and type of packages used (usually, "All packed in one fibreboard box." *note the spelling). If using an overpack, state "Overpack Used".

Example: 30 ml (if packaged in one primary container)

15 ml X 2 (if packaged in two primary containers).

- j. Packing Instructions: Enter appropriate packing instruction number found in Table 3.
- k. Authorization: Leave this column blank.
- I. Additional Handling Instructions: Leave this field blank if using the Chemtel number.
- m. **Emergency Telephone Number:** An emergency contact number must put in this area. It is imperative that the number given can be answered 24 hours a day until the package is delivered. This is a precaution in case of an emergency such as a spill.
- n. **Certification Statement:** The bottom of the Shipper's Declaration for Dangerous Goods must state "*I declare that all of the applicable air transport requirements have been met"*. If this is not printed on the declaration, you must write it in
- o. Name/Title of Signatory: Name and title of the person signing the declaration. This person must be trained!
- p. **Place and Date:** Place and Date of signing the declaration.
- q. **Signature:** The shipper must sign this document.

eShip Users:

The following information will automatically appear on the Dangerous Goods Declaration when using the eShip program.

Emergency Contact: CHEMTEL 1-800-255-3924 (1+813-248-0585 international) Contract#: MIS5858352

This number must be used by anyone from the University of Pennsylvania that will be shipping Dangerous Goods.

University has a contract with CHEMTEL to provide 24-hour emergency telephone response service.

A copy of the completed Shippers Declaration must be sent to CHEMTEL at least 24-hours prior to the shipment being sent.

To forward SHIPPING DOCUMENTS, use: <u>UPEHRS@CHEMTELINC.COM</u> To forward SAFETY DATA SHEETS, use: <u>SDS@chemtelinc.com</u>

2. Air Waybill

(UPS will NOT SHIP Infectious Substance, Category A!!) (**eShip users**: the air waybill is completed for you within the web program)

- a. Infectious Substance, Category A
 - i. For an infectious substance, under "Handling Information" on the Air waybill, state "Dangerous Goods per attached Shipper's Declaration for Dangerous Goods" or "Dangerous Goods per attached Shipper's Declaration for Dangerous Goods Cargo Aircraft only".
- b. Biological Substance, Category B
 - i. The name, address and phone number of the responsible person must be on this document if it is not on the box.

NOTE: The phone number of the responsible person can be the shipper, consignee, or a third party that is knowledgeable about the shipment. The number must be available during regular business hours in case of questions or problems.

- ii. Dry Ice must appear as the following: (Dry Ice UN 1845 X kg)
- iii. The "Nature and Quantity Goods" box must show the text "BIOLOGICAL SUBSTANCE, CATEGORY B" and UN 3373.
- c. Exempt Patient Specimens
 - i. The "Nature and Quantity Goods" box must show the text "Exempt Animal Specimen" or Exempt Human Specimen".
- d. Dry Ice
 - i. The "Nature and Quantity Goods" box must show the text "Dry Ice UN 1845 X kg".
- e. Excepted Quantities
 - i. The "Nature and Quantity Goods" box must show the text "Dangerous Goods in Excepted Quantities".
- f. Dry Shipper
 - i. eShip users: select Dry Shipper as the package type
 - ii. The "Nature and Quantity Goods" box must show the text "not restricted" and "A152".
- g. Liquid Nitrogen
 - i. The "Nature and Quantity Goods" box must show the text "UN1977 Nitrogen, refrigerated liquid".

Part III. Special Regulations

A. Special Regulations for Select Agents



In 2003 the federal government designated certain biological agents and toxins as Select Agents based on their potential to pose a threat to the public health.

Select Agents are regulated by the Centers for Disease Control and Prevention (CDC) and the Ani mal Plant Health Inspection Service (APHIS).

<u>Select Agents and Toxins List</u>: See Table 4 for a complete list of Select Agents and Toxins. The list is also available at <u>https://www.selectagents.gov/selectagentsandtoxinslist.html</u>.

Possession, use and/or transfer of Select Agents must be registered with EHRS <u>and</u> CDC or APHIS *prior* to bringing the materials to Penn's campus.

All Select Agent transfers must be authorized in writing by the director of EHRS prior to the transfer. Additional shipping requirements and restrictions apply to Select Agents. They are not discussed in this manual. **Contact EHRS for assistance with Select Agents. Also visit** <u>www.cdc.gov/od/sap/</u>

B. Import and Export of Biological Materials & Infectious Substances

The import or export of animals, animal-derived materials, insects, etiologic agents, biological toxins, or genetically-modified organisms may require a federal permit from the CDC, United States Department of Agriculture (USDA), or the US Fish and Wildlife Services (USFWS). An export license from the Departments of Commerce, State, and Treasury may also be required.

International Shipments

Shipping and receiving animals and animal-derived materials, infectious or biohazardous agents, biological toxins, and genetically modified organisms may require the approval of federal agencies, both domestic and foreign. Regulations that govern the transfer of biological materials help to minimize or eliminate the possible threats to public health and agriculture.

Packages shipped internationally generally require <u>increased preparation time</u> due to the additional paperwork required. An import/export permit may be required when shipping biological materials internationally. Check with U.S. governmental agencies for permits and additional information.

Countries may change their import requirement without notice!!

1. Import and Export Permits:

<u>CDC</u>

A permit is required to import biological agents or vectors of human disease, which includes bats, bat specimens and non-human specimens, into the U.S. from another country and to transport interstate.

Import Permit Program (IPP): <u>https://www.cdc.gov/cpr/ipp/index.htm</u> Do you need an import permit?

IPP Tool: https://www.cdc.gov/cpr/ipp/etool.htm

Frequently asked questions: <u>http://www.cdc.gov/od/eaipp/faq.htm</u>

When a CDC permit is NOT required:

If the material being imported has been rendered sterile (e.g., thermal, chemical, or irradiation treatment) or it has been confirmed not to contain infectious agents for humans.
 Documentation stating this is required!

Other materials that *do not* require a CDC issued import permit include:

- Select agents listed in 42 CFR Part 73 if its importation has been authorized in accordance with 42 CFR 73.16 or 9 CFR 121.16.
- Diagnostic specimen not known by the importer to contain, or suspected by the importer of containing, an infectious biological agent and is accompanied by an importer certification statement confirming that the material is not known to contain or suspected of containing an infectious biological agent, or has been rendered noninfectious Include documentation with the shipping papers.
- Animal or animal product being imported for educational, exhibition, or scientific purposes and is accompanied by documentation confirming that the animal or animal product is not known to contain (or suspected of containing) an infectious biological agent or has been rendered noninfectious.
- Nucleic acids that cannot produce infectious forms of any infectious biological agent and the specimen is accompanied by an importer certification statement confirming that the material is not known to contain or suspected of containing an infectious biological agent.
- Animal or animal product listed in 42 CFR Part 71 if its importation has been authorized in accordance with 42 CFR §§ 71.52, 71.53, or 71.56.
- Product that is cleared, approved, licensed, or otherwise authorized under any of the following laws:
 - The Federal Food, Drug, and Cosmetic Act (21 U.S.C. § 301 et seq.), or
 - Section 351 of the Public Health Service Act pertaining to biological products(42 U.S.C. § 262), or
 - The Virus-Serum-Toxin Act (21 U.S.C. §§ 151-159).

Importer or Exporter Certification Statement:

Please Note: The CDC requires that importers of materials that do not require a CDC import permit, include with the shipment an **importer certification statement** confirming that the material is not known to contain or suspected of containing an infectious biological agent, or has been rendered noninfectious. See Appendix F for a template letter.

The certification statement must include:

- A detailed description of the material; and
- A statement on official letter head signed by the person responsible for the shipment clearly stating that (1) the material is not known or suspected to contain an infectious biological agent and (2) how the person making the certification knows that the specimen does not contain an infectious biological agent; or the basis of the belief that there is no reason to suspect that the specimen does not contain an infectious biological agent; or a detailed description of how the material was rendered noninfectious.

USDA/APHIS

Imports (into the United States)

APHIS issues permits for the import, transit and release of regulated animals, animal products, veterinary biologics, plants, plant products, pests, organisms, soil, and genetically engineered organisms.

Permits:https://www.aphis.usda.gov/wps/portal/aphis/ourfocus/importexportVeterinary services Permitting Assistant:https://efile.aphis.usda.gov/s/vs-permitting-assistant

Exports (into other countries)

Import permits are usually required for materials of animal origin. Please check with the recipient to ensure they have the proper import permits. This will vary from country to country.

A <u>USDA Health Certificate</u> may be required for exporting some animal material:

VS Form 16-4 (<u>https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/export/iregs-for-animal-product-exports</u>)

U.S. Fish and Wildlife

The U.S. Fish and Wildlife issues permits under various wildlife laws and treaties at different offices at the national, regional, and /or wildlife port levels. Permits are issues to the individual.

Permits enable the public to engage in legitimate wildlife-related activities that would otherwise be prohibited by law. The permit programs ensure safeguarding wildlife and promote conservation efforts by authorizing scientific research, generating data, or allowing wildlife management and rehabilitation activities to go forward.

A <u>CITES permit</u> is required for all nonhuman primate tissues or tissues from any endangered species. Forms may need an institutional authority signature. Reach out to EHRS for details.

Permits: https://fwsepermits.servicenowservices.com/fws

2. Export Control Laws:

Export Control Laws (ECLs) are a complex set of federal regulations designed to protect U.S. national security; to prevent the proliferation of weapons of mass destruction; to further U.S. foreign policy including the support of international agreements, human rights and regional stability; and to maintain U.S. economic competitiveness.

All materials shipped out of the United States are subject to ECLs including the International Traffic in Arms Regulations (ITAR), and the Export Administration Regulations (EAR).

Do you need a permit to export biological materials?

- a. ECFR
 - 1. 1C351 Human and animal pathogens and "toxins"
 - 2. 1C353 Genetic elements and genetically modified organisms
 - 3. 1C354 Plant pathogens
 - Pathogens listed on the Australia Group (AG) List "List of Human and Animal Pathogens and Toxins for Export Control" of the Commerce Control List: <u>https://www.ecfr.gov/current/title-15/part-774</u>
- b. Give as much information as possible to prevent materials being held in Customs.
 - 1. Commercial Invoice
 - 2. Certification Statement (see template letter in Appendix F)

*If shipping bovine serum, submit documentation from the company to verify origin.

Resources:

Office of Research Services: http://www.upenn.edu/researchservices/exportcontrols.html

U.S. Department of Commerce:

https://www.bis.doc.gov/index.php/regulations/commerce-control-list-ccl

U.S. Department of State:

https://deccs.pmddtc.state.gov/deccs?id=ddtc_public_portal_itar_landing

3. Commercial Invoice/Customs Invoice

- All International shipments will require a Commercial Invoice or Customs Invoice.
 - **eShip users:** the description you enter under **"Material Name"** will become the wording for the description of the goods in the **Commercial Invoice**. Print out this document along with the shipping papers.
 - If you are using another program for UPS, FedEx, DHL, or World Courier, they will be provided with their paper work.

4. Brokers

• Certain countries require packages to be routed through a customs broker to complete customs procedures. The following vendors are University-approved Freight Forwarder/Customs Broker (FF/CB)

eShip Global: support@eshipglobal.com; https://upenn.eshipglobal.com;

Geodis: <u>https://cms.business-services.upenn.edu/purchasing/making-purchases/purchasing-basics/commodity-buying-tips/310-526536.html</u>

Priority Worldwide Services: <u>https://cms.business-</u> <u>services.upenn.edu/purchasing/component/content/article/10-supplier-</u> <u>database/311-526812.html</u> (PWS does not ship any animal products or animals related materials or anything tested in animals)

*There is a fee for this service. The University's MasterCard Purchasing Card can be used for FF/CB service fees up to \$1,000. Any FF/CB service fees over \$1,000 requires use of a UPENN Purchase Order.

Part IV.

Shipping Company Limitations and Private Transport

Some shipping companies may have rules that are more restrictive than those discussed in this document. See IATA 2.8.4 List of Operator Variations for a complete list of variations from the regulations. Consider the following details before planning a shipment:

A. United States Postal Service (USPS)

- Infectious substance, Category A will not be accepted.
- **Biological substance, Category B**, if packaged and labeled according to the requirements listed in this manual for category B shipments, may be mailed as First-Class Mail, Priority Mail, or Express Mail.

Please check their website for more information:

Publication 52, Hazardous, Restricted, and Perishable Mail (<u>http://pe.usps.com/text/pub52/welcome.htm</u>)

UPS Guide for Shipping Ground and Air Hazardous Materials (<u>http://ups.com/hazmat</u>)

- Genetically modified organisms or Genetically modified micro-organisms are not accepted in UPS small package services
- **Exempt human and animal specimens** can be mailed provided packaging and labeling follow the requirements listed in this manual for exempt human and animal specimens.

Outer packaging must be rigid Total volume per package is limited to 500ml or 500g

B. FedEx Corporation (FedEx)

• Fed Ex Express and Fed Ex Ground will accept shipments prepared according to instructions in this manual. Fed Ex will not accept any material considered to be in Risk Group 4. Please refer to the Biosafety in Biomedical and Microbiological Laboratories manual for the definition of Risk Groups.

C. United Postal Service (UPS)

• UPS will only ship Biological Substance, Category B.

D. DHL Express

• DHL will accept shipments in accordance with IATA or DOT regulations. Shipments made according to instructions in this manual will be acceptable to DHL.

DI. World Courier

• World Courier provides global hand-held service for Dangerous Goods shipments. Contact the company directly to set up an account and shipping request.

DII. Transport by private or contract carrier exemption

 Any biological specimens, which includes patient samples, that are being shipped for research, diagnosis, investigational activities or disease treatment and prevention are exempt from the IATA and DOT regulations when being transported by a private or contract carrier as long as the motor vehicle being used is exclusively for transport of these materials. Infectious substance, Category A materials are NOT included in this exemption.

Part V. Emergency Response for an Infectious Substance in Transport

The best advice to give in case of an emergency:

- **1. Stay upwind.**
- 2. Keep unauthorized personnel away.
- 3. Do not allow anyone to touch or walk through spilled material.
- 4. Do not allow clean-up of the spill or disposal of the material except under the supervision of an expert.

If you are receiving a package:

- 1. Inspect the package before signing for it.
- 2. Do not accept damaged or leaking packages.
- 3. Packages are the responsibility of the shipper until the receiver (YOU) accept them!!!

Part VI. Summary

Things to remember

1. Identify your shipment correctly!! Classify, Mark and Label!

2. TRAINING!

If you are involved with shipping and put you name on the package as the "shipper", you absolutely must be trained. An individual, as well as the institution, can be fined and put in jail if the regulations are not followed. That means, if you ship and have your name specified as the shipper, you are responsible to go through the training!!

- 3. Keep your training certificate on file (available in Penn WorkDay).
- 4. Check EHRS website for updates.
- 5. Refresher training every 24 months.
- 6. Use **Chemtel** for the emergency phone number.

1(800) 255-3924 (1+ 813 248-0585 international) Contract # MIS5858352

- 7. After completion of the Shipper's Declaration for Dangerous Goods, FAX to EHRS for approval. (EHRS FAX number: 215-898-0140)
- 8. Keep Shipper's Declaration for Dangerous Goods on file for 24 months.
- 9. Know the exemptions!

Sweat the details!!

10. Follow this manual for packaging and documenting your hazardous good shipment.

Remember, shipping hazardous chemicals and radioactive materials within and outside of the United States is subject to a variety of government regulations, airline industry regulations, and ground carriers' requirements. Do not hesitate to ask for assistance! Contact the Office of Environmental Health and Radiation Safety with any questions.

Table 1. The Category A List

This table is not exhaustive. Infectious substances, including new or emerging pathogens, which do not appear in the table but which meet the same criteria must be assigned to Category A. In addition, if there is doubt as to whether or not a substance meets the criteria if must be included in Category A.

UN Number and Proper Shipping Name	Microorganism						
	Bacillus anthracis (cultures only)						
UN 2814 Infectious	Brucella abortus (cultures only)						
substance, affecting	Brucella melitensis (cultures only)						
humans	Brucella suis (cultures only)						
numans	Burkholderia mallei-Psuedomonas mallei-Glanders (cultures only)						
	Burkholderia pseudomallei-Psuedomonas pseudomallei (cultures only)						
	Chlamydia psittaci-avian strains (cultures only)						
	Clostridium botulinum (cultures only)						
	Coccidioides immitis (cultures only)						
	Coxiella burnetti (cultures only)						
	Crimean-Congo hemorrhagic fever virus						
	Dengue virus (cultures only)						
	Eastern equine encephalitis virus (cultures only)						
	Esherichia coli, verotoxigenic (cultures only)						
	Ebola virus						
	Flexal virus						
	Francisella tularensis (cultures only)						
	Guanarito virus						
	Hantaan virus						
	Hantaviruses causing hemorrhagic fever with renal syndrome						
	Hendra virus						
	Hepatitis B virus (cultures only)						
	Herpes B virus (cultures only)						
	Human immunodeficiency virus (cultures only)						
	Highly pathogenic avian influenza virus (cultures only)						
	Japanese Encephalitis virus (cultures only)						
	Junin virus						
	Kyasanur Forest disease virus						
	Lassa virus						
	Machupo virus						
	Marburg virus						
	Monkeypox virus						
	Mycobacterium tuberculosis (cultures only)						
	Nipah virus						
	Omsk hemorrhagic fever virus						
	Poliovirus (cultures only)						
	Rabies virus (cultures only)						
	Rickettsia prowazekii(cultures only)						
	Rickettsia rickettsii (cultures only)						
	Rift valley fever virus (cultures only)						
	Russian spring-summer encephalitis virus (cultures only)						
	Sabia virus						
	Shigella dysenteriae type 1 (cultures only)						
	Tick-borne encephalitis virus (cultures only)						
	Variola virus [i.e. Small Pox]						
	Venezuelan equine encephalitis virus (cultures only)						
	West Nile virus (culture only)						
	Yellow fever virus (cultures only)						
	Yersinia pestis (cultures only)						

UN Number and Proper Shipping Name	Microorganism				
	African swine fever virus (cultures only)				
UN 2900 Infectious substance, affecting animals	Avian paramyxovirus Type 1 – Velogenic Newcastle disease virus (cultures only)				
	Classical swine fever virus (cultures only)				
	Foot and mouth disease virus (cultures only)				
	Goatpox virus (cultures only)				
	Lumpy skin disease virus (cultures only)				
	Mycoplasma mycoides-ContagiousContagious bovine pleuropneumonia (cultures only)				
	Peste des petits ruminants virus (cultures only)				
	Rinderpest virus (cultures only)				
	Sheep-pox virus (cultures only)				
	Swine vesicular disease virus (cultures only)				
	Vesicular stomatitis virus (cultures only)				

Category B

An infectious substance which does not meet the criteria for inclusion in the Category A List must be assigned to UN 3373.

Feature	PI 650	PI 620	
Primary container	Present	Present	
Secondary container	Present	Present	
Outer container	Present	Present	
Absorbent material for entire contents	Present	Present	
United Nations design type testing* (performance requirements)			
1.2 m drop test	Must pass	Must pass	
9 m drop test	Not required	Must pass	
Puncture test	Not required	Must pass	
Water immersion test	Not required	Must pass	
Test reports	Should be available	Must be available	
UN specification mark	Not required	Required	
Minimum dimensions	Defined	Defined	
Volume and weight restrictions	Defined	Defined	
Packaging size restrictions	Defined	Defined	
*PI 650 packages are not required to meet UN perform 1.2m drop test.	nance requirements pro	ovided they pass a	

Table 2. Comparison of PI 650 and 620

Pressure testing of either primary or secondary containers for both PI 602 and PI 650 must pass requirements of withstanding, without leakage, an internal pressure producing a pressure differential of not less than 95 kPa and temperatures in the range of -40° C to $+55^{\circ}$ C (-40° F to 130° F).

Shipment Type	Proper Shipping Name	UN Number	Hazard Class	Packing Group (PG)	Packing Instruction (PI)	Max. Net qty/pkg for Passenger Aircraft	Max. Net qty/pkg for Cargo Aircraft
Category A infectious substance, affecting humans	Infectious substance, affecting humans (technical name)	UN 2814	6.2	-	620	50 ml or 50 g	4 L or 4 kg
Category A infectious substance, affecting animals	Infectious substance, affecting animals (technical name)	UN 2900	6.2	-	620	50 ml or 50 g	4 L or 4 kg
Category B infectious substance	Biological substance, Category B	UN 3373	6.2	-	650	4 L or 4 kg	4 L or 4 kg
Dry Ice	Dry Ice or Carbon Dioxide, solid	UN 1845	9		954	200 kg	200 kg
Non- infectious, GMOs	Genetically Modified Micro- organisms	UN 3245	9	-	959	No limit	No limit
Infectious GMOs	Infectious substance, affecting humans () OR Infectious substance, affecting animals ()	UN 2814 Or UN 2900 Or UN 3373	6.2	-	620	50 mL or 50 g	4L or 4 kg
Patient Specimens	"Exempt human specimens" or "Exempt animal specimens"	_	_	_	Triple packaging	No limit; package must have adequate strength for its content and be leak-proof	No limit; package must have adequate strength for its content and be leak-proof

 Table 3: Summary of Shipping Information

Table 4: Select Agents and Toxins List

HHS AND USDA Select Agents AND TOXINS 7 CFR Part 331, 9 CFR Part 121, and 42 CFR Part 73 HHS SELECT AGENTS AND TOXINS **OVERLAP SELECT AGENTS AND** Abrin TOXINS Bacillus cereus Biovar anthracis* Bacillus anthracis* Botulinum neurotoxins* Bacillus anthracis Pasteur strain Botulinum neurotoxin producing species of Clostridium* Brucella abortus Conotoxins (Short, paralytic alpha conotoxins containing the Brucella melitensis following amino acid sequence X1CCX2PACGX3X4X5X6CX7)¹ Brucella suis Coxiella burnetii Burkholderia mallei* Crimean-Congo haemorrhagic fever virus Burkholderia pseudomallei* Diacetoxyscirpenol Hendra virus Eastern Equine Encephalitis virus³ Nipah virus Ebola virus* Rift Valley fever virus Francisella tularensis* Venezuelan equine encephalitis virus³ Lassa fever virus **USDA SELECT AGENTS AND TOXINS** Lujo virus African horse sickness virus Marburg virus* African swine fever virus Monkeypox virus³ Avian influenza virus³ Reconstructed replication competent forms of the 1918 Classical swine fever virus pandemic influenza virus containing any portion of the Foot-and-mouth disease virus* coding regions of all eight gene segments (Reconstructed Goat pox virus 1918 Influenza virus) Lumpy skin disease virus Ricin Mycoplasma capricolum³ Rickettsia prowazekii *Mycoplasma mycoides*³ SARS-associated coronavirus (SARS-CoV) Newcastle disease virus^{2,3} SARS-CoV/SARS-CoV-2 chimeric viruses resulting from Peste des petits ruminants virus any deliberate manipulation of SARS-CoV-2 to incorporate Rinderpest virus* nucleic acids coding for SARS-CoV virulence factors Sheep pox virus Saxitoxin Swine vesicular disease virus South American Haemorrhagic Fever viruses: Chapare - Guanarito - Junin - Machupo - Sabia **USDA PLANT PROTECTION AND** Staphylococcal enterotoxins A,B,C,D,E subtypes **QUARANTINE (PPQ) SELECT AGENTS** T-2 toxin AND TOXINS Tetrodotoxin Coniothyrium glycines (formerly Phoma Tick-borne encephalitis complex (flavi) viruses: glycinicola and Pyrenochaeta glycines) Far Eastern subtype *Peronosclerospora philippinensis* Siberian subtype (Peronosclerospora sacchari) Kyasanur Forest disease virus Ralstonia solanacearum Omsk hemorrhagic fever virus *Rathavibacter toxicus* Variola major virus (Smallpox virus)* Sclerophthora ravssiae Variola minor virus (Alastrim)* Synchytrium endobioticum Yersinia pestis* Xanthomonas oryzae

*Denotes Tier 1 Agent

¹ C = Cysteine residues are all present as disulfides, with the 1st and 3rd Cysteine, and the 2nd and 4th Cysteine forming specific disulfide bridges; The consensus sequence includes known toxins α -MI and α -GI (shown above) as well as α -GIA, Ac1.1a, α -CnIA, α -CnIB; X1 = any amino acid(s) or Des-X; X2 = Asparagine or Histidine; P = Proline; A = Alanine; G = Glycine; X3 = Arginine or Lysine; X4 = Asparagine, Histidine, Lysine, Arginine, Tyrosine, Phenylalanine or Tryptophan; X5 = Tyrosine, Phenylalanine, or Tryptophan; X6 = Serine, Threonine, Glutamate, Aspartate, Glutamine, or Asparagine; X7 = Any amino acid(s) or Des X and; "Des X" = "an amino acid does not have to be present at this position." For example if a peptide sequence were XCCHPA then the related peptide CCHPA would be designated as Des-X.

 2 A virulent Newcastle disease virus (avian paramyxovirus serotype 1) has an intracerebral pathogenicity index in day-old chicks (Gallus gallus) of 0.7 or greater or has an amino acid sequence at the fusion (F) protein cleavage site that is consistent with virulent strains of Newcastle disease virus. A failure to detect a cleavage site that is consistent with virulent strains does not confirm the absence of a virulent virus.

³ Select agents that meet any of the following criteria are excluded from the requirements of this part: Any low pathogenic strains of avian influenza virus, South American genotype of eastern equine encephalitis virus , west African clade of Monkeypox viruses, any strain of Newcastle disease virus which does not meet the criteria for virulent Newcastle disease virus, all subspecies Mycoplasma capricolum except subspecies capripneumoniae (contagious caprine pleuropneumonia), all subspecies Mycoplasma mycoides except subspecies mycoides small colony (Mmm SC) (contagious bovine pleuropneumonia), and any subtypes of Venezuelan equine encephalitis virus except for Subtypes IAB or IC, provided that the individual or entity can verify that the agent is within the exclusion category. 9/10/13

Appendix A

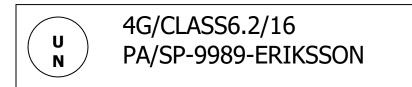
Manufactures of Certified Shipping Containers for Infectious substances, Biological substances and Dry Ice

Inmark, Inc. (SAF-T-PAK supplies) 675 Hartman Rd Suite 100 Austell, GA 30168 Phone: 800-646-6275 https://lifescience.inmarkinc.com

Therapak (sold through Fisher Scientific) 4304 Hamilton Mill Road Suite 200 Buford, GA 30518 Phone: 770-614-2931 https://therapak.com HAZMATPAC, Inc 7905 Blankenship Drive Houston, TX 77055 Phone: 800-923-9123 http://www.hazmatpac.com

Appendix B

UN Specification Marking for Infectious Substance, Category A



UN = United Nations 4 = box, G = fiberboard CLASS6.2 = meets performance testing for Category A 16 = year box was made PA = state SP-9989-ERIKSSON = manufacturer

This marking must be on boxes being used for shipping Infectious Substances unless using an overpack. When using an overpack, the outer box must be marked "Overpack". This indicates that packages on the inside comply with prescribed specifications.

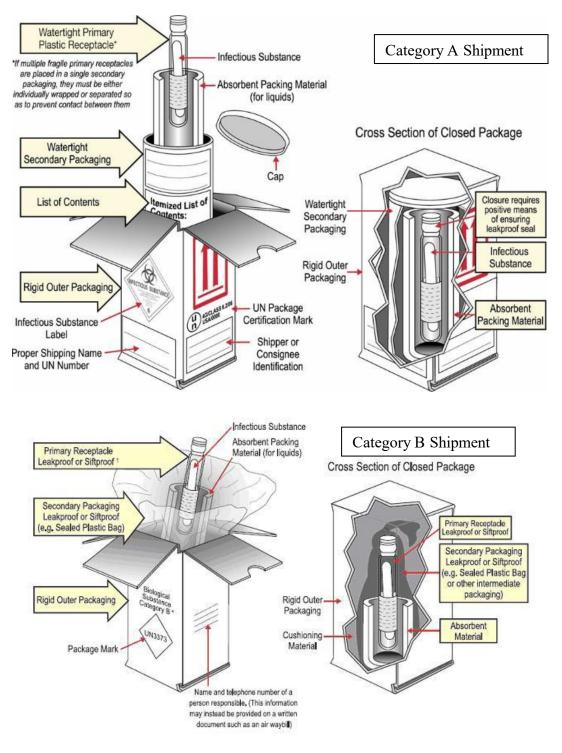
Performance Testing

Each primary or secondary container must have passed the performance testing required by the UN. The primary receptacle or secondary container must be capable of withstanding, without leakage, an internal pressure producing a pressure differential of not less than 95 kPa and temperatures in the range of -40° C to $+55^{\circ}$ C (-40° F to 130° F).

The following are also performance tests for the primary and or secondary containers:

- ✓ Drop test
 - $_{\odot}$ $\,$ PI 620 for Infectious Substances must pass a drop of 9 m $\,$
 - PI 650 for Diagnostic Specimens must pass at least a 1.2 m drop
- ✓ Puncture test
 - PI 620 must pass puncture tests
- \checkmark Water immersion test
 - \circ PI 620 must pass water immersion testing

Appendix C Triple Packaging



* The proper shipping names "Biological Substance, Category B"; "Clinical Specimen"; and "Diagnostic Specimen" are authorized until December 31, 2006. From January 1, 2007 only the proper shipping name Biological Substance, Category B^{*} will be authorized.
 f If multiple fragile primary receptacles are placed in a single secondary packaging they must be either

- individually wrapped or separated to prevent contact
- Note: Follow package manufacturer's closure instructions

APPENDIX D Shipper Declaration

SHIPPER'S DECLARATION FOR DANGEROUS GOODS (Provide at least three copies to the operator) Shipper Air WayBill No: 788068739426 The University of Pennsylvania Marie-Luise Faber Page 1 of 1 pages 215-746-6706 3160 Chestnut Street Shipper's Reference Suite 400 Philadelphia, PA 19104 United States Consignee , Sue Souder 111-222-3333 3160 Chestnut Street Philly, PA 19104 United States Three completed and signed copies of this Declaration must be handed to the operator WARNING **Transport Details** Failure to comply in all respects with the applicable Dangerous Goods Regulations may be in breach of the applicable law, This shipment is within the Airport of limitations prescribed for: Departure subject to legal penalties. (cross out non applicable) PASSENGER CARGO AND CARGO AIRCRAFT AIRCRAFT ONLY Shipment type: (cross out non-appicable) Airport of Destination: NON-RADIOACTIVE RADIOACTIVE NATURE AND QUANTITY OF DANGEROUS GOODS **Dangerous Goods Identification** UN Quantity and Packing Class or Authorization Packing OF Division Subsidian type of packaging Inst. **Proper Shipping Name** ID Grou No. UN2814 Infectious substance, affecting 6.2 0.001 L 620 humans(EBOLA VIRUS) UN1845 Dry Ice 9 954 3.6 Kg All packed in one Fibreboard Box **Additional Handling Information** Person Responsible : Marie-Luise Faber 215-746-6706 Emergency Telephone Number: Emergency 24-hr Chemtrec telephone number: 1-800-424-9300 Acct# CCN15532 I hereby declare that the contents of this consignment are fully and Name/Title of Signatory accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all Marie-Luise Faber (Researcher/Staff) Place and Date respects in proper condition for transport according to applicable Philadelphia, PA 10/13/2017 International and National Governmental Regulations. I declare that Signature all of the applicable air transport requirements have been met. (see warning above) FOR RADIOACTIVE MATERIAL SHIPMENT ACCEPTABLE FOR PASSENGER AIRCRAFT, THE SHIPMENT CONTAINS RADIOACTIVE MATERIAL INTENDED FOR USE IN OR INCIDENT TO RESEARCH, MEDICAL DIAGNOSIS, OR TREATMENT. ADR EUROPEAN TRANSPORT STATEMENT: ARRIAGE IN ACCORDANCE WITH 1.1.4.2.1

APPENDIX E

Export controls on biological and chemical materials being sent out of the country

Do I need a license?

The transfer of biological and chemical materials outside of the country may trigger the need for an export license. In most cases, the transfer of such biological and chemical materials will be allowed without the need to apply for a license from the federal government. In some cases, however, a license may be required from the U.S. Department of Commerce, the U.S. Department of State, and/or the U.S. Department of the Treasury, depending upon: the nature and amount of the materials; to whom the materials are being sent; the destination; and the purpose for which the materials are being sent.

Examples of materials that may require a license include biological materials that could be used in chemical or biological weapons (pathogens, toxins, etc.). The lists of materials that could require a specific license application are contained in the applicable regulations. (To review the lists of biological and chemical materials that the Department of Commerce regulates for export control licenses, see https://www.ecfr.gov/current/title-15/part-774, particularly sections 1C350 through 1C360.)

In addition to the export controls described above based on the nature of the materials being transferred, there are regulations administered by the Department of the Treasury applying to exports going to specific countries, individuals or entities. Examples would include individuals the government has identified as being involved with terrorism, drug trafficking or other illicit activities. Countries against which the federal government has imposed trade sanctions and travel embargoes (such as Cuba, Iran, etc.) also have restrictions and might require applying for an export license before shipping materials. The lists are maintained by the federal government and need to be checked prior to shipping biological or chemical materials. (Links to the various government lists are available from the Office of Research Service's web site at http://www.upenn.edu/researchservices/exportcontrols.html).

Any individual planning to transfer materials should work with the University to check the regulations and, if necessary, apply for the appropriate license. Failure to do so may result in significant criminal and civil liabilities. You should contact the Office of Research Services as soon as possible, because the federal government can take significant time in determining whether to grant the export license. If you are transferring materials pursuant to an outgoing material transfer agreement, sponsored research agreement, clinical trial agreement, or other agreement negotiated and signed by the Office of Research Services, ORS will work with you in advance to determine whether an export license might be needed as part of performing the contract.

For information on export control matters, as well as contacts for additional information/guidance, please review the website of the Office of Research Services at http://www.upenn.edu/researchservices/exportcontrols.html or contact

Jessica Buchanan, Associate Director, Export Compliance Office of Research Services P-221 Franklin Building 3451 Walnut Street Philadelphia, PA 19104-6205 <u>expctrl@lits.upenn.edu</u> Phone: 215-573-8817

APPENDIX F

Use the following letter as a Certification Statement for international **inbound** shipments of nonregulated materials to the USA. Complete the text highlighted in yellow with the information appropriate for your shipment, print on letterhead, and include with the shipment.

→ INBOUND and OUTBOUNT letter templates can be found on the EHRS website.

*Non-regulated outbound shipments may want to use a similar letter. Exclude the TSCA statement for use with outbound shipments.

- I FTTER HEAD -DATE Dear Sir/Madam, I am writing to confirm that this package contains XXX (simple description of the material, including quantity and volumes) for medical research purposes only (or for diagnostic testing) and has no monetary value. Recipient: NAME ADDRESS **TELEPHONE NUMBER** The samples do not fall under IATA Dangerous Goods regulations. Enter needed "I certify" statements to delcare this material as not regulated, nonhazardous, non-infectious. The following is an example: I certify that the shipment contains no toxic or chemical substances, and is not subject to TSCA. I certify that there is no animal originating material present. These samples are human material that was neither inoculated with nor exposed to, infectious agents of agricultural concern, including zoonotic agents. A materials transfer agreement has been agreed between sending and recipient parties. These samples are from patients with trauma who have been recruited into an observational research study and there is no reason to suspect they contain a biological infectious agent. The value for customs purposes: \$1.00 US Dollar. I hereby declare the above information to be correct. YOUR NAME **YOUR ADDRESS** YOUR TELEPHONE NUMBER DATE

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