

Are You a Hazardous Material Shipper?



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By Ben Seidel

Most of you reading this will answer NO. In our industry, it is very common to ship or receive injection pumps and injectors via UPS, FedEx, USPS or other common carriers. Most of the time, oil or fuel leaks are not an issue, although all of us have opened or received shipping boxes that were oil soaked.

In the past, this was just a hazard of the products we repair. No more. Now you could be considered a "Hazardous Materials Shipper." Here is a story of an experience we had earlier this year.

We received a pump from a customer that we were shipping to another DSD for sublet repairs. Our customer brought the pump to our shop partly packaged. Our front counter man, noting no external leaks, gave the package to our shipping department, which over-boxed the package and shipped it out United Parcel Service - Next Day Air. Unknown to us, the pump had diesel fuel in it. The box while in transit had been turned on its side or upside down and drained diesel fuel out. UPS contacted us first, informing us that a package with tracking number "xyz" had been detained due to a fuel/oil leak and that the FAA had quarantined this pump. UPS also immediately suspended our account, allowing us to only receive incoming shipments.

To have our shipping "privileges" reinstated, UPS had to visit our shop, inspect our operations and determine if we were intentionally trying to skirt the system by not labeling hazardous shipment as such. I had to write a long letter to UPS, explaining how this happened, why it happened, what we were doing to prevent this from happening in the future, what our procedures were, what changes we were going to make and how we were going to train our personnel so this did

not occur again. After five days of having our shipping privileges removed, we were able to ship packages again via UPS.

This was not the end; next, I was answering questions to a FAA dangerous goods/cargo security investigator, with possible fines pending. Luckily, the leak was diesel fuel. Had it been gasoline, this situation would have been considered even more dangerous. We had to produce written shipping instructions, change our package handling procedures, implement a formal *corrective/preventive* actions plan and had to prove that our shipping personnel were trained in the new procedures. WOW. I never thought such a thing could cause so much trouble, but it can and did.

This pump was originally shipped on July 1, and we (finally) returned the pump to our customer on July 25. We also picked up the cost of a rental car for a week, due to the length of time it took to resolve the situation. We had absolutely no control over the entire situation once we shipped the pump and it was caught leaking.

Make sure your shipping department never ships a pump with a test oil, diesel fuel or engine oil leak. In addition, overnight shipping usually involves use of airplanes to move cargo, and this type of situation is more critical than packages shipped via ground using truck or rail transportation.

Recommended Shipping Procedures:

1. Always make sure the products are drained of all liquids (i.e. test oil, diesel fuel and engine oil) before packaging.
2. Use cap plugs on all fittings and fuel inlets and outlets.
3. Pack unit in a sturdy plastic bag; make sure the plastic is strong enough to ensure bag does not rip during shipping.
4. Review these precautionary procedures with all personnel responsible for shipping.
5. Post a sign in shipping area with above instructions as a constant reminder. ■