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Importing to the U.S.: What You Need to Know

By Natalie Stevens, Regulatory Compliance Specialist, Office of Research Compliance and Training

Members of the Columbia community may be interested in importing materials to the University for various purposes. For example, a researcher conducting fieldwork abroad may want to bring artifacts back to the U.S. for evaluation. A PI may want to receive biological samples from a foreign collaborator for use in a scientific project. No matter the case, there are important regulatory factors that must be considered before importing.

Overview of Regulations

Customs and Border Protection (CBP) is the primary agency which regulates the movement of goods into the country. CBP enforces U.S. trade laws by requiring importers to appropriately classify goods, submit documentation and maintain records. CBP is also responsible for ensuring tariffs/duties have been paid on imported goods. Many organizations, including Columbia, work with Customs Brokers who can assist importers with navigating complex CBP requirements. Other federal agencies regulate imports of certain materials. Some of these agencies include:

- Department of Agriculture
- Centers for Disease Control and Prevention
- Food and Drug Administration
- Fish and Wildlife Service
- Environmental Protection Agency

Depending on the material, additional import permits, licenses or declarations may be required. Failing to comply with these requirements can have real consequences, even when the import is for research purposes.

Recent Enforcement Cases

In February 2025, a Harvard researcher was detained by CBP after failing to declare biological materials they were carrying. The researcher, a Russian national, was returning to the U.S. from France, where they had acquired samples of clawed frog embryos intended for use in cancer research. Upon arrival in the U.S., their checked bag was flagged for additional inspection, and they were found to be carrying the undeclared specimens. As a result, the researcher was detained and informed that their visa was being cancelled. They were subsequently sent to an ICE detention facility in Louisiana while deportation proceedings commenced. The researcher was later released from ICE custody but continues to face legal action. They were charged with smuggling, concealment of a material fact, and making a false statement. If convicted, the researcher faces up to 20 years in prison and fines of up to \$250,000.

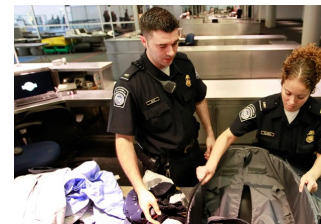
Another example is a recent case from the [University of Michigan in November of 2025](#).

Key Takeaways and Questions to Consider

These enforcement actions demonstrate the serious consequences of non-compliance with federal import regulations, whether knowingly or unknowingly. Before importing materials, researchers should be aware of the requirements to avoid penalties. Some questions to consider are:

1. **What are you importing?** CBP requires appropriate declaration, classification, and documentation of all goods entering the U.S. Depending on the material, additional federal agency requirements may apply.
2. **Where and who are you importing it from?** Certain countries are subject to sanctions by the U.S. government. Transactions with sanctioned countries are prohibited without a license. Even in non-sanctioned countries, certain individuals and entities may be subject to restrictions. It is important to know who you are dealing with when working with foreign vendors and ensure appropriate screening has been conducted.
3. **How is it getting here?** There may be different permit and declaration requirements for shipping materials vs. hand-carrying them. Without the proper documentation, hand-carrying goods may be viewed by CBP as a smuggling attempt. Columbia strongly encourages individuals to ship goods and materials rather than attempt to hand-carry them into the U.S. from abroad. For assistance navigating CBP requirements, Columbia's designated Customs Broker, D.B. Schenker, is available and can be contacted through the [Columbia Procurement Office](#).

If you are importing to the U.S. and need an import permit, license or declaration, please review the following: [Columbia Imports](#), [Columbia Biological Material Shipping Guidelines](#), [Columbia Biological Shipping Manual](#), [Columbia Customs and Tariffs](#), [CBP Import & Export Website](#).



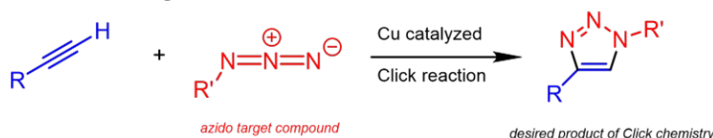
Kaitlyn's Korner: Tales from a Seasoned Safety Officer

By: Dr. Kaitlyn G. Dutton, Core Facilities and Instruments Manager for Barnard Chemistry

Overview: This series highlights safety incidents that have occurred in real chemistry laboratories, while providing insight into what caused the incident and corrective actions to prevent future incidents. These stories are true anecdotes from academic laboratories in the United States and are intended to inform and remind researchers of potential hazards in the chemistry laboratory. This edition covers azide and azido compound safety.

Incident: A researcher working on small molecule synthesis needed to create an azide precursor for a later Click reaction.

Click Reaction for Ring Formation:



The targeted precursor was an aliphatic compound with a terminal azido group - easily achievable via SN2 reaction of an alkyl halide with sodium azide. The researcher set up the SN2 reaction, combining their alkyl halide with excess sodium azide in a solvent that the alkyl halide was soluble in - namely dichloromethane (methylene chloride).

The reaction proceeded at room temperature, and the workup called for solvent evaporation using a rotator evaporator (rotovap) under reduced pressure and elevated temperature conditions. The researcher set up their flask on the rotovap, which was located on a benchtop, and turned on the heating bath and vacuum pump.

During rotary evaporation, the reaction flask suddenly burst violently - sending contaminated glass shards flying in all directions. The researcher monitoring their flask on the rotovap was mildly injured, requiring a few stitches due to cuts from the glass shards. No one else was injured.

What happened?

The researcher in this scenario did not recognize the inherent hazards present when working with azide compounds, and they inadvertently made the situation more dangerous with their choice of solvent.

In this case, the excess azide anions in solution reacted with the solvent, dichloromethane, to displace the chlorides and generate diazidomethane, CH₂(N₃)₂. Diazidomethane has 6 nitrogen atoms and 1 carbon atom, and when subjected to the elevated temperatures during solvent removal, sufficient energy was available to result in the violent decomposition of this azido-byproduct.

Tips for Azide Safety:

The azide group (N₃⁻) is inherently an energetically-packed molecule, as well as a superb nucleophile. Azido-compounds can be unstable, tending to react violently and explosively, if the balance of nitrogen atoms to other similar-sized atoms is off. To determine if an azide compound would be safe to make, consult the Carbon to Nitrogen (C/N) Ratio formula for Azide safety; see below for the formula and some tips to keep your azide reactions at a safe scale.

$$\text{C/N Ratio: } \frac{(\# \text{ of C atoms}) + (\# \text{ of O atoms})}{(\# \text{ of N atoms})} \geq 3$$

- C/N ratio > 3: can be synthesized and isolated in their pure form. Danger level: LOW
- C/N ratio greater than 1 but no more than 3: can be synthesized and isolated, but should be stored below room temperature at no more than 1M concentration and at a maximum of 1.0 grams of material. Danger level: MEDIUM.
- C/N ratio < 1 should never be isolated: It may be synthesized if the azide is a transient intermediate species AND the limiting reagent in the reaction mixture AND has a maximum quantity of 0.1 grams. Danger level: HIGH - DO NOT ISOLATE!

In this scenario, the researcher accidentally made diazidomethane by combining dichloromethane and sodium azide, where diazidomethane has a C/N ratio of 0.1667 (EXTREME DANGER). When using azide compounds, halogenated solvents (i.e., dichloromethane, chloroform, carbon tetrachloride) should be avoided at all costs to prevent accidental generation of severely hazardous, potentially explosive azide-containing byproducts. Researchers who have questions about azide safety are always encouraged to reach out to Environmental Health & Safety for guidance.

Visitors in the Laboratory

If you anticipate visitors in your laboratory, please review the requirements below and complete the [Qualtrics](#) form so EH&S can assist with ensuring appropriate approvals, training, and safety measures are in place before they enter the laboratory.

If any visitor is a minor, registered this activity with the [Protection of Minors Office](#).

- No one under the age of 14 is allowed into a Columbia University Laboratory, unless present on an organized tour or field trip for strictly observational purposes. (Even if a child is under the supervision of a parent or guardian, their presence is strictly prohibited.)
- In addition, minors are not allowed to handle human blood, human cell lines or "other potentially infectious materials," research animals, or be left unattended in a laboratory.
- [Radiation Safety Manual](#): Minors **may not** handle radioactive materials, minors may not operate open XRF or other open X-ray devices; minors may operate enclosed X-ray devices with X- direct supervision of the PI, sponsor or an officer of the University.
- For more information, please refer the [Guidelines for Short-term Visitors in Research-related and Clinical Activities](#). Please ensure all visitors have access to and wear proper PPE at all times, including :

- Closed toe shoes and long pants or equivalent (as required by your laboratory policy)
- Safety glasses (when required by the task/space)
- Laboratory coat and gloves as appropriate for the activity

EH&S would like to congratulate Columbia University graduates on all the hard work and dedication!

This is not the end, but the beginning of your next great adventure. Keep dreaming big and chasing your goals.



The Silver Lining: Exploring Waste Management Solutions for Darkrooms

By Ryan Taveras, Senior Hazardous Materials Specialist

Since the 19th century, photography has transformed how people capture and understand the world, particularly in medical imaging and scientific research. Traditional film processing, however, relies heavily on chemical solutions that generate hazardous waste. Over time, Environmental Health and Safety (EH&S) programs and government regulations have developed procedures to ensure these wastes are handled safely and responsibly to protect both people and the environment.

Film processing converts a latent image on photographic film into a permanent visible image. After exposure to light or radiation, silver halide crystals in the film react chemically. In a darkroom, the film is developed using chemical solutions that convert exposed silver halide crystals into metallic silver, making the image visible. The film is then placed in a fixer solution, which removes unexposed crystals and stabilizes the image. Finally, the film is washed and dried.

Because film quality depends on precise chemical composition, temperature, and timing, many research and medical facilities use automated film processors. These machines deliver controlled amounts of developer and fixer solutions through tubing systems connected to chemical tanks and water supplies. While automation improves consistency and efficiency, it also generates continuous hazardous waste streams.

One of the most significant waste streams is spent fixer solution, which contains dissolved silver along with chemicals such as ammonium thiosulfate and sodium sulfite. Silver is regulated because of its toxicity to aquatic life and may qualify as hazardous waste under the Environmental Protection Agency's Resource Conservation and Recovery Act (RCRA). Waste containing more than 5 parts per million (ppm) of leachable silver is classified as hazardous and must be managed according to strict regulations.

Darkroom operations also produce scrap film, contaminated absorbent materials, and spill debris. Equipment issues such as leaking tubing or damaged chemical tanks can create additional contamination risks. Any materials exposed to film-processing chemicals must be properly segregated, labeled, and disposed of according to EH&S requirements.

Until recently, EH&S used silver recovery traps on film processors to reduce the amount of silver entering drain systems. These cartridges contained steel wool that chemically converted dissolved silver into solid metallic silver. While effective, the system required regular maintenance and occasionally caused equipment service interruptions.

This spring, EH&S transitioned to a direct waste collection system to improve compliance and efficiency. Instead of routing spent fixer through recovery cartridges, the waste is now collected directly into 5-gallon hazardous waste containers connected to the film processors. Because the fixer solution still contains dissolved silver, the collected waste is managed as hazardous waste and transported by approved vendors to treatment, storage, and disposal facilities (TSDFs).

The new system simplifies waste handling, reduces the risk of improper disposal into sewer systems, and improves operational reliability. Proper labeling of hazardous waste containers remains essential and must identify all chemical constituents and associated hazards.

EH&S continues to work closely with facilities staff, vendors, and darkroom users to support safe operations through waste collection programs, compliance monitoring, training, and preventive maintenance. Darkroom users should routinely verify that tubing connections remain secure and monitor collection containers for potential overflows. If spills or leaks occur, EH&S provides technical expertise and response coordination to manage incidents safely.

The ongoing transition from film-based imaging to digital systems has significantly reduced the need for chemical processing and hazardous waste management. Digital imaging allows images to be captured, stored, and analyzed electronically, eliminating many traditional darkroom hazards while improving workflow efficiency. Although digital systems have largely replaced film in many healthcare and research environments, some specialized applications still rely on film processing.

As institutions continue moving toward digital imaging, older darkroom equipment must be carefully decommissioned in coordination with EH&S. This includes removing residual chemicals, disconnecting tubing systems, decontaminating equipment, and ensuring all hazardous waste is properly managed. While the final image may be what people see, responsible management of the unseen byproducts reflects an institution's true commitment to safety, compliance, and environmental stewardship.

Meet the EH&S Staff



Pam Shively

Associate Manager, Safety Training Programs

Pam Shively brings a lifetime of experience, and a whole lot of energy, to the EH&S team. Pam joined Columbia University on April 24, 2018, beginning as a short-term casual staff member in the dosimetry program after retiring from more than 30 years of teaching, coaching, and sports officiating in Indiana.

Her roots are in Warsaw, Indiana—known as the “Orthopedic Capital of the World”—but Pam says there is no place she would rather be than New York City: “The city is alive!” She began her first job delivering the Fort Wayne Journal Gazette newspaper in Warsaw at the age of eight and continued until she graduated high school.

These days, Pam is focused on strengthening safety beyond the classroom and the lab. She is partnering with the [Safety Training Consortium](#) on a Field Research Safety training module—helping ensure that people working in the field have the knowledge and tools they need to stay safe.

Pam’s drive comes from a familiar source: challenge. She is motivated by being told she cannot do something—a mindset she has carried with her throughout her career. In the fourth grade she was told by the coach she was too short to play basketball; she started on the Varsity team in high school as a freshman. The Warsaw Tigers won a state championship and during her four years on the team only lost ten games. She went on to play college basketball at Manchester College in Indiana.

And she credits one of the best pieces of professional advice she has ever received, and which Pam credits with helping her stay grounded is “treat custodians and administration staff with respect, those are the people who will take care of you.” Her favorite quote is one she heard from David B. McCracken (son of Branch McCracken, IU Men’s Coach, who won the National Title in 1940) at basketball camp, “You gotta play with your feet and your hands and your head. You have gotta think, think, think. But most of all, you gotta play with your heart.”

When she is not working, Pam can often be found doing what she loves most: playing pickleball, especially with the Upper Westside Pickleball Community, whose home base is the North Meadow Center in Central Park. Pam describes the group as welcoming and supportive, “like family.” She also enjoys spending time with family and friends, reading, and winding down by taking Walter, her corgi, for a walk.

Pam has a hobby that is hard to miss once you learn about it: she collects Snoopy, with more than 1,000 pieces in her collection. It is a fun reflection of her personality, much like an otter: playful, energetic, and adventurous, making them the “life of the party”. When asked what characteristic she likes most about herself, Pam says she is faithful and will do anything for her family and friends.

From supporting critical safety programs to building community on and off campus, Pam embodies the mix of dedication, heart, and can-do attitude that strengthens EH&S every day.

Fastenal Team

Paul Pires, Brian Devonish, Windsor Frank

On the first floor of Chandler Hall, Paul Pires and Brian Devonish work side by side, playing a vital role in supporting the Morningside Chemistry Department. Paul is responsible for processing incoming hazardous chemical containers, which includes applying RFID identification tags, auditing existing inventory, and servicing yellow disposal bins. In addition, he helps maintain emergency readiness by ensuring that fire extinguishers and spill kits are fully operational in Chandler, Havemeyer, and the Northwest Corner Building.

Brian shares many of these same responsibilities, also overseeing the processing of hazardous chemical containers for the department. His work similarly involves tagging, inventory auditing, and maintaining disposal systems. Brian extends his safety oversight to CEPSSR, S.W. Mudd, and Schermerhorn, where he ensures emergency equipment is ready for immediate use.

On the second floor of Pupin Hall, Windsor Franco supports the Morningside Biology Department, along with other departments engaged in hazardous work. Windsor’s role includes processing incoming hazardous chemical containers, applying RFID identification tags, auditing inventories, and servicing disposal bins. Windsor also ensures that fire extinguishers and spill kits are prepared and accessible in Engineering Terrace, Fairchild, and Pupin.

While each team member is responsible for specific buildings and departments, their collaboration extends far beyond individual assignments. Together, they provide essential services such as collecting regulated medical waste from frequent generators across Morningside, initiating the collection and separation of batteries for recycling at both Morningside and Columbia University Irving Medical Center, working with audits and spill kits at Manhattanville, and assisting EH&S teams with fieldwork like oxygen sensor calibrations.



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2025 Report

ENVIRONMENTAL HEALTH & SAFETY

COLUMBIA UNIVERSITY
Environmental Health & Safety

**EH&S Proudly Presents
Their 2025 Annual Report**

A snap shot of all the various activities occurring, many times behind the scenes, to the vast CU research community. Special thanks to Lauren Kelly and Calista Bryant for their efforts in the publication.

**Please review the 2025
Environmental Health and Safety
Annual Report**

The Importance of Procurement Through Approved Vendors

By Hadler da Silva, Senior Safety Advisor

Procurement of potentially hazardous items at Columbia University is governed by structured policies designed to ensure safety, regulatory compliance, and accountability. Central to this system is the CU Marketplace, an electronic procurement platform that provides access to pre-approved, contracted vendors. This system is not only intended to streamline purchasing but also to reduce risk by ensuring that goods are sourced from reputable suppliers with known safety standards and traceable product histories.

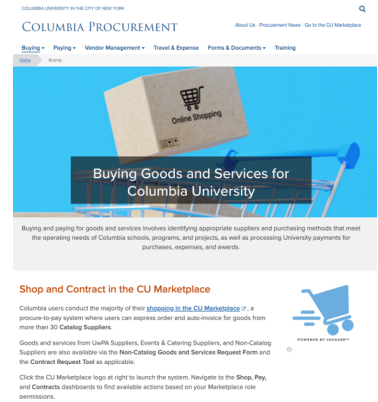
The CU Marketplace allows users to create requisitions, obtain approvals, and issue purchase orders within a controlled environment, integrating financial oversight and vendor management systems. Importantly, Columbia's procurement policies require that purchases be made through approved mechanisms and by authorized personnel, ensuring that items are acquired using appropriate channels and subject to review. For hazardous materials, this process often includes additional layers of approval, such as "Special Approvers," who review regulated commodities like radioactive materials, or specialized equipment before purchasing authorization. These safeguards are critical in minimizing risks associated with improper sourcing, storage, and handling.

Using approved vendors within the CU Marketplace offers several key safety advantages. First, vendors are vetted and often operate under University-Wide Purchasing Agreements, ensuring that products meet quality and regulatory standards. Second, procurement through this system creates a documented chain of custody, which is essential for hazardous materials that require tracking and safety data sheets (SDS). Third, centralized procurement reduces the likelihood of counterfeit, expired, or improperly labeled materials entering university spaces.

In contrast, purchasing hazardous items outside of approved systems introduces significant risks. A recent incident involving Columbia affiliates highlights this concern: individuals purchased compressed gas cylinders through a posting on Facebook Marketplace without any documentation regarding whether the cylinders were empty, properly maintained, or safe for use. Compressed gases are particularly hazardous due to risks of high pressure, potential toxicity, and explosion if mishandled. Without knowledge of the cylinders' history including their prior contents and structural integrity, users could unknowingly expose themselves and others to serious injury.

This incident underscores the importance of adhering to institutional procurement policies. Informal purchasing channels like peer-to-peer marketplaces lack oversight, quality assurance, and accountability. Unlike CU Marketplace vendors, sellers on such platforms are not required to provide safety certifications, maintenance records, or compliance documentation.

Ultimately, procurement through approved vendors is not merely an administrative requirement but a critical component of minimizing risk. By enforcing structured purchasing pathways, the University ensures that hazardous items are sourced responsibly, handled safely, and compliant with applicable regulations. Deviations from these processes can undermine these safeguards and place individuals, facilities, and research activities at unnecessary risk.



Important C-14 Permit Information

When the FDNY C-14 permit arrives, EH&S enters the information in the LION database. This allows PIs the ability to track the number of lab members who are C-14 holders. LION will also send a reminder to the permit holder when it is time to renew. Renewal form should be sent to EH&S at the email below.

Once you receive your card, place a photocopy adjacent to the door inside the laboratory for the Fire Inspector to review.

If you have any questions regarding C-14 permits, please contact fire-life@columbia.edu.

EH&S Runners



Congratulations to the EH&S Runners who completed the 3rd Annual Armory Indoor Marathon (Milan Tyler, Kyle Marquez, Pam Shively, Kathleen Crowley, Chara Proud, Peter Caracappa, Flavia Villegas, and Hadler da Silva).

Lauren Kelly completed the 2026 Boston Marathon. Lauren was also awarded the "Out of Towner" Award recognizing a runner not from Boston, but whose passion for the Boston Marathon rivals even the most dedicated locals. She raised more than \$40,000 for amyotrophic lateral sclerosis (ALS) and was the second highest fundraiser of all CharityTeams!

Peter Caracappa completed the 2026 Brooklyn Marathon.

To Reuse or Not to Reuse? The PPE Question Every Radiation Researcher Should Be Asking

By Samuel Dindayal, Senior Health Physicist

A recent laboratory incident at a Columbia University research facility underscores the importance of strict PPE protocols. A lab member who was performing an experiment with radioactive materials reused a pair of disposable gloves. As a result, radioactive contamination was transferred to the researcher's hands and clothing.

The incident was resolved without lasting harm: the researcher promptly and thoroughly rinsed and washed the affected areas to remove the contamination. However, the outcome could have been substantially more serious under different circumstances. Had the researcher been working concurrently with hazardous chemicals or dangerous biological agents, - or if the contamination was not identified and promptly removed - the lapse in PPE protocol could have led to serious health consequences.

This incident is not unique. Across research institutions nationwide, the improper reuse of disposable PPE is a documented cause of preventable laboratory accidents.

Disposable vs. Reusable

All PPE used in Columbia University laboratories falls into one of two categories: disposable (single-use) or reusable. The distinction is critical and is typically indicated on the product packaging.

- **Disposable PPE – Single Use Only**
Disposable PPE is engineered for a single use. Its protective properties – including material integrity and barrier resistance – degrade or are compromised after initial contact with hazardous substances. Reusing disposable PPE provides a false sense of protection and actively creates contamination risk. Items in this category include: disposable gloves (latex, nitrile, vinyl), disposable laboratory coats and coveralls, disposable face shields.
- **Reusable PPE – Multi-Use with Maintenance**
Certain PPE items are constructed of durable materials designed to withstand repeated use, provided they are inspected, cleaned, and maintained according to manufacturer specifications. These items do not need to be discarded after a single use unless they are visibly damaged or soiled beyond the point of being able to be fully decontaminated. Reusable PPE includes: non-disposable laboratory coats, non-disposable face shields, safety glasses and goggles.

Proper Disposal of Disposable PPE

All disposable PPE must be discarded after each use in the appropriate waste stream. General disposal guidance is as follows:

Standard non-hazardous PPE (e.g., gloves used with non-hazardous materials) may be discarded in regular laboratory trash.

- PPE contaminated with chemical hazards must be placed in chemical waste containers in accordance with EHS chemical waste disposal guidelines.
- PPE contaminated with biological materials must be disposed of as biohazardous waste (regulated medical waste bag).
- PPE used during work with radioactive materials requires radiation survey before disposal – see below.

Special Requirements for Radioactive Material Work

Researchers working with radioactive isotopes are subject to additional disposal requirements under federal, state and city radiation safety regulations, as well as Columbia University Radiation Safety Office (RSO) policy. These requirements exist because radiologically contaminated PPE constitutes radioactive waste and must be managed accordingly.

Before disposing of any PPE used during work with radioactive materials, researchers must:

- Survey the PPE using an appropriate radiation detection instrument (e.g., Geiger-Müller counter or scintillation detector suited to the isotope in use).
- If contamination is detected, segregate the item and dispose of it through the radioactive waste stream and notify the Radiation Safety Office immediately.
- If no contamination is detected, document the survey result and dispose of the item per standard procedures.

Isotopes Requiring Particular Attention

The following isotopes are commonly used in Columbia University laboratories and warrant careful PPE survey and disposal practices:

- P-32 (Phosphorus-32) – high-energy beta emitter; capable of significant dose to skin and eyes
- I-125 (Iodine-125) – low-energy gamma emitter with potential for thyroid uptake; may require thyroid bioassay monitoring when using high activity levels

Researchers who are uncertain about survey procedures or waste disposal requirements for specific isotopes should contact the Radiation Safety Office before beginning work.

Make safety your priority when working with hazardous materials

The correct use and disposal of PPE is not a procedural formality – it is a fundamental element of research safety and regulatory compliance. From the incident above, it is clear that a single, seemingly minor deviation from PPE protocol can create significant contamination risk and potential for harm.

EH&S is committed to supporting the research community in maintaining the highest standards of laboratory safety. For questions about PPE selection, laboratory safety practices, or radiation safety compliance, visit the EH&S website at www.ehs.columbia.edu, reach out by email or phone, or visit us in person. We are here to help!

EH&S Graduates

Dwayne Bryant - Master in Medical Physics - SEAS
David Skorodinsky - Master in Applied Analytics - SPS

EH&S Work Anniversary

David Skorodinsky - Five Years

Editorial Staff: Kathleen Crowley, Marianne McCartney, Chris Pitoscia, Pam Shively
Please share questions or comments with us at newsfeedback@columbia.edu