

Transporting
Infectious Substances Safely
CDC Webinar
Atlanta, GA
August 15, 2018



Infectious Substances Guide



Objective

- Provide a general overview of the regulatory requirements for transporting Division 6.2 materials:
 - Package Selection
 - Marking and Labeling
 - Shipping Papers and Emergency Response Information
 - “Transportation” Security Plan and Training
- Inspection Process / Top Violations



Category A Infectious Substance

- UN2900, Infectious substances, affecting animals *only*, 6.2 (NO Tech name)
“or”
- UN2814 , Infectious substances, affecting humans, 6.2 (NO Tech name)

Category B Infectious Substance

- UN3373, Biological substance, Category B, 6.2



Packaging Requirements

| Title 49 Section 173 | Requirement |
|----------------------|---|
| 173.24 | General Packaging |
| 173.24a | Requirements for all HAZMAT |
| 173.24a(c) | Changes regarding Infectious Substances and mixed content |
| 173.134(b) | Exceptions for: |
| 173.134(c) | Division 6.2 Packaging Regulated Medical Waste |
| 173.196 | Category A Infectious Substance |
| 173.197 | Regulated Medical Waste |
| 173.199 | Category B Infectious Substance |
| 173.199 | Category B Infectious Substance |

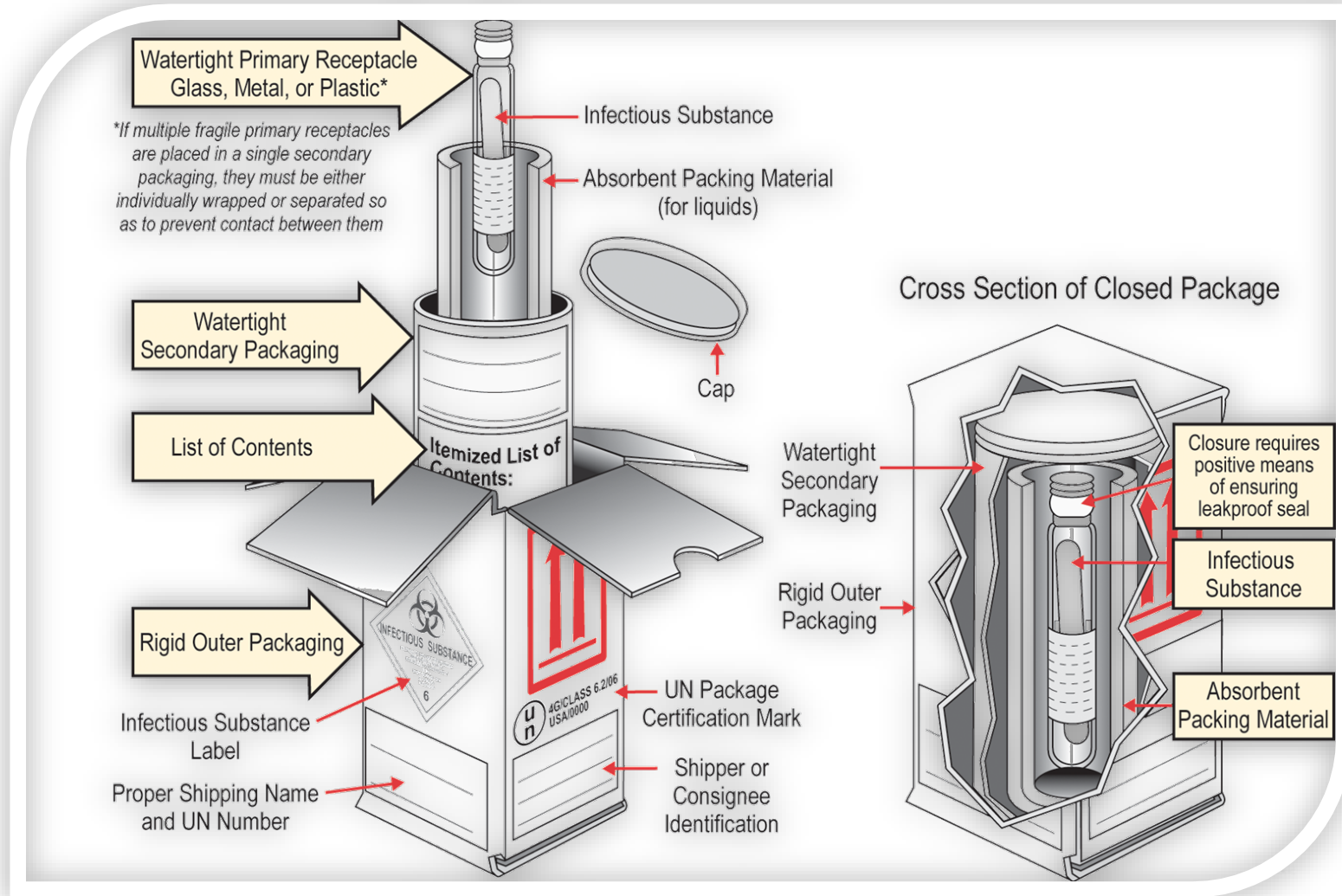


Other Pertinent References

- 171.15 Incident Reporting
- 172.203(k) Shipping paper Technical Name
(not on shipping paper or package)
- 172.301(b) Package. No technical name
- 172.704(a) Hazmat Training
- 172.802 Transportation Security Plan Requirements
- 173.27 Aircraft Transportation

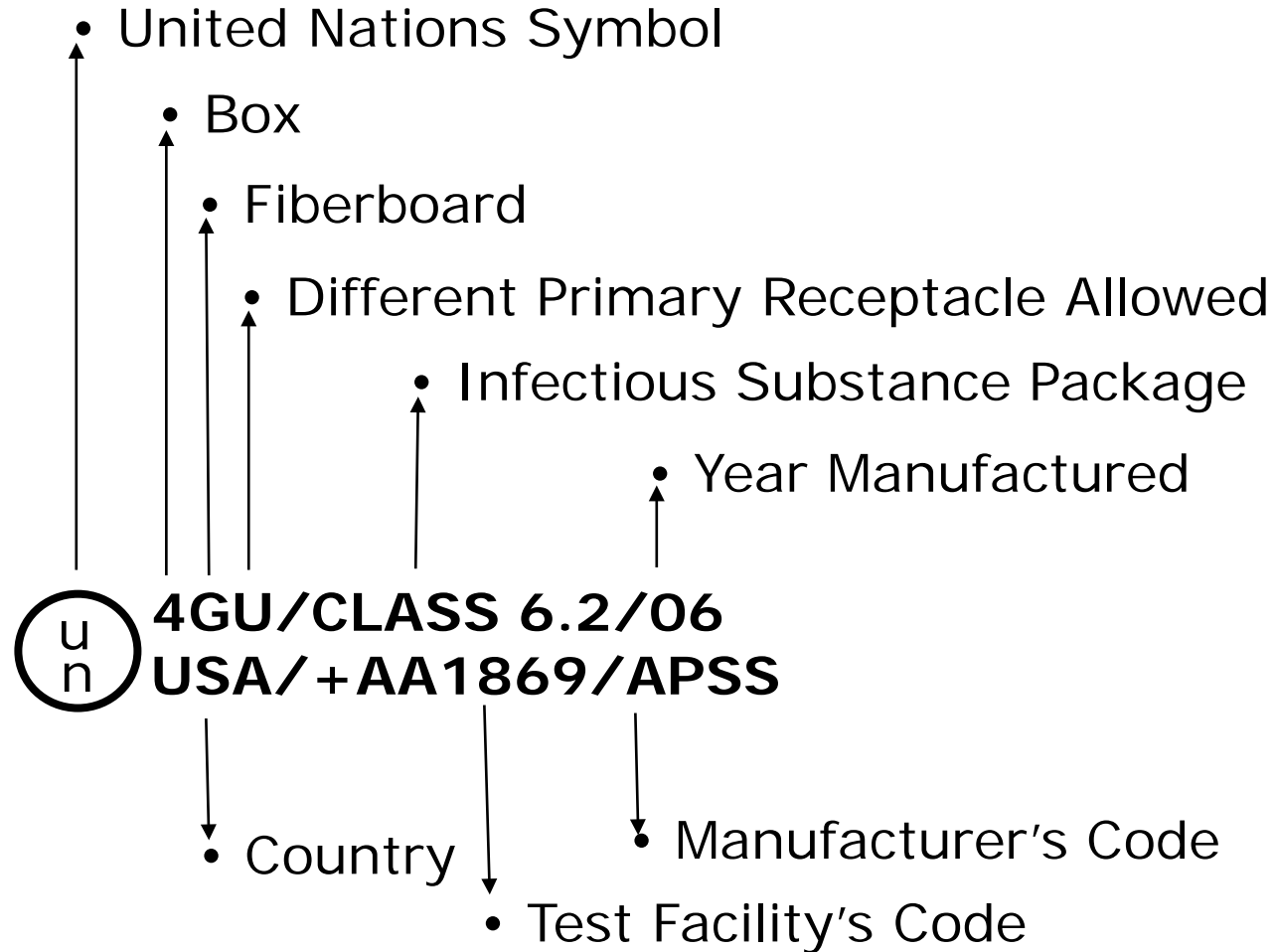


Category A Packaging



UN Packaging

Division 6.2 Category A



Testing of Packages

178.609

- Cat A Pkg: UN certified (4G or 4GU /Class 6.2)

Wet box for 1hr to represent 2” of rain per hr; then drop from 30 ft.

Freeze pkg 24 hr at 0 degrees then drop test.

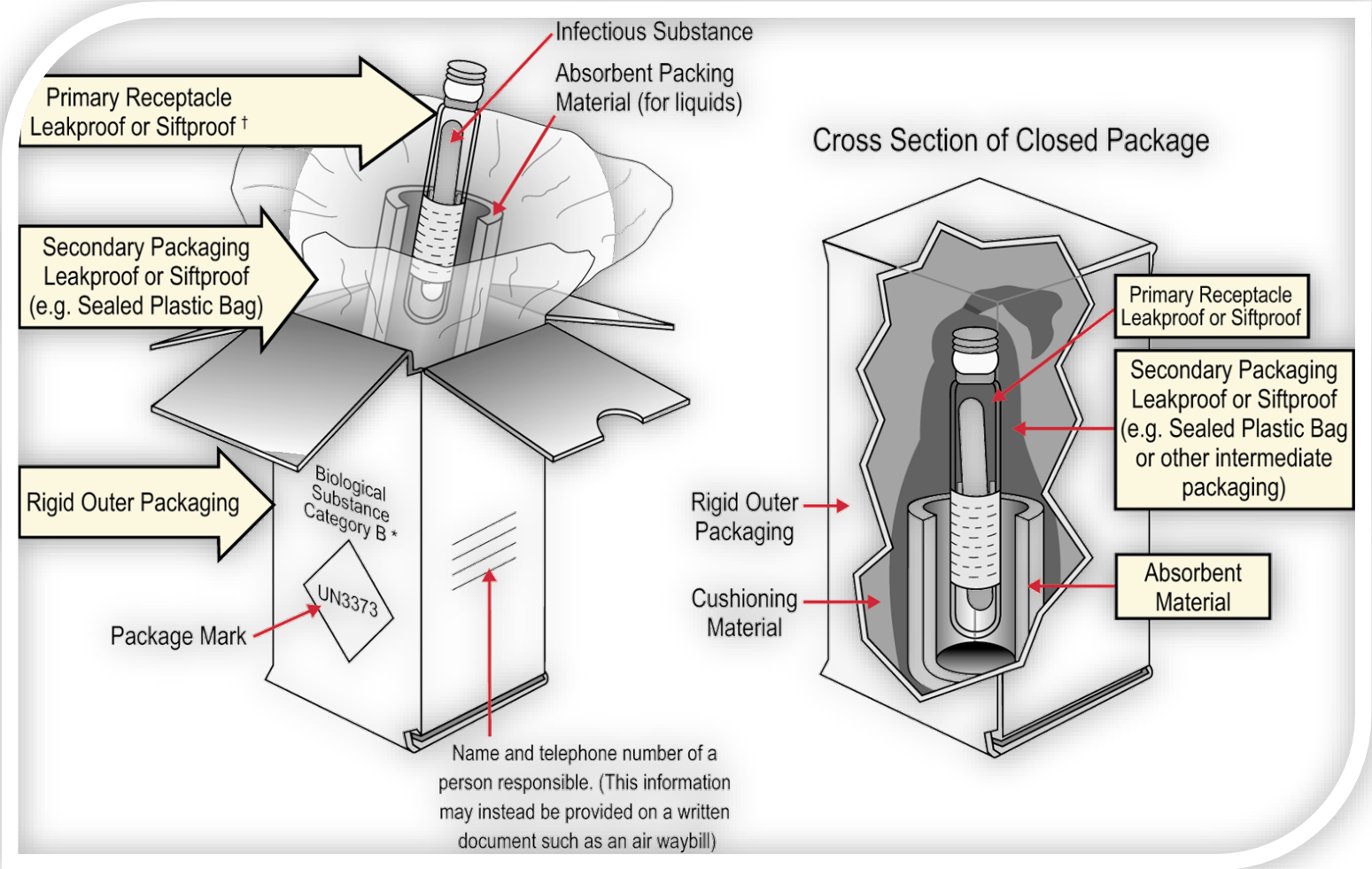
Drop 1 ½” diameter, 15 lb steel rod, onto box or drop box onto steel rod.

Dry Ice specific tests (if pkg intended to contain)

Variations “U”: Smaller inner pkg; less number inner pkgs; fragile inner pkgs.



Category B Packaging



Cat “B” Non-Spec Package 173.199 Requirements Only

- Strong outer package
- Triple package – non tested.
- **Capable** of passing drop testing from 3.9 ft.
- Primary receptacles: Leakproof, will not break.
- Secondary receptacles: Secured within outer pkg
- Outer receptacles: Pkg prevents release of material
- Marking: **UN 3373**, Label “4 inch sides” (2” min)
- Name/address of person knowledgeable: Doc or pkg.
- Liquid Stabilizers: 1 oz/30 ml max.



Pkg Marking/Label Requirements

- **Category A**
 - Proper shipping name & UN 2814 or UN 2900
(*No tech name on pkg per 172.301(b))
 - Shipper or Consignee identification
 - Infectious Substance Label 172.432 (Chgd 1 Oct 14)
 - Orientation arrows (as applicable)
- **Category B**
 - Proper shipping name and UN3373 Label
 - Name and telephone number of responsible person
(may be placed on separate document such as air waybill)
 - Orientation arrows (as applicable)



Labeling Requirements



& § 173.134(c)(d)



§ 172.432



§ 173.199(a)(4)
Category B infectious substance



§ 172.302
Bulk Marking (can also be on plain white placard)



Shipping Papers

- **Category A**
 - Identification Number
 - Proper Shipping Name / Tech Name
 - “Suspected Category A infectious substance” (Lost in the crowd concept)
 - Hazard Class/Division
 - NO Packing Group
 - Type Pkg/Unit of Measure (QTY)
 - Shipper’s Certification
 - Emergency Response Telephone Number
- **Category B (unless excepted)**
 - No shipping papers required

49 CFR Part 172, Subpart C



Emergency Response Information

- Requirements for providing and maintaining emergency response information identified in 172.602, Subpart G
- **On shipping paper - Stands out.**
- Exception: not required if a shipping paper is not required (Info: Shipper name/phone # on pkg or airway bill)



Photo: Lawrence Berkeley National Lab



Transportation Security Plan

172.802

- A “transportation” security plan is required:
 - Ship Select agents or toxins regulated by CDC or USDA (any amount)
- The plan must include:
 - Assessment of site/transportation security risks
 - Address personnel security, unauthorized access, and en-route security
 - Job titles, duties, training plan
 - Reviewed annually/revised as required

49 CFR 172.800(b)(6)



Other Training Requirements

- Federal hazmat transportation law 49 CFR, Part 172, Subpart H, requires training of *all* hazmat employees. Training must include:
 - General Awareness / Familiarization
 - Safety
 - Function Specific
 - Security Awareness
 - In-depth Security Tran Sec Plan (If Applicable)
- Anyone shipping infectious substances must have “knowledge and training”

49 CFR 172.704(a); 173.134(b); 173.199(e)

To Protect People and the Environment From the Risks of
Hazardous Materials Transportation



Compliance Inspections

NO NOTICE!!!!!!

Introduction / Invite your representatives

Purpose / Tour facility: Inf Sub – Reg Med Waste – Chemical Waste

Packaging: Non-bulk, bulk, inner pkgng/liners,

Tested packages used (UN) (Pkgng is Our specialty)

Bills of Lading (Infectious Sub)

Training: Gen Aw/Function Spec/Sec Awareness/

Safety/Security plan (if required)

Security Plan (Select Agent Shippers only)

Exit Briefing: With or without violations noted.



Top Violations / Inspection Results

- Training
- Security Plan Requirements
- DOT/CDC Inspection Team – 300 + inspections since 2008
- Last 2 years been great. Minor violations.



Hazardous Material Info-Center

1-800-HMR-4922

(1-800-467-4922)

E-mail: infocntr@dot.gov

HAZMAT.dot.gov

Hours of Operation: 9 am – 5 pm ET



- Obtain answers to HMR questions
- Request copies of Federal Register, special permits or training materials
- Report HMR violations
- Fax on Demand



Contact Information

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