



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
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Reference No. 20-0035

This letter is in response to your April 24, 2020, email, and November 4, 2020, telephone call with several members of the Office of Hazardous Materials Safety, Pipeline and Hazardous Materials Safety Administration (PHMSA) requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the marking requirements for non-bulk packagings. Specifically, you ask whether a “technical name” and/or “specific name” is required to be marked on a non-bulk package containing a material assigned one of the following proper shipping names: “UN2814, Infectious substances, affecting humans, 6.2;” “UN2900, Infectious substances, affecting animals *only*, 6.2;” “UN3462, Toxins, extracted from living sources, solid, n.o.s., 6.1, PG I/II/II;” or “UN3172, Toxins, extracted from living sources, liquid, n.o.s., 6.1, PG I/II/III.”

For a package containing a Division 6.1 material such as UN3462 or UN3172, the answer is yes. The technical name is required to be marked on the outside of a non-bulk packaging in accordance with § 172.301(b). The HMR require a technical name, as defined in § 171.8, to be used on the shipping paper (see § 172.203(k)) and outer packaging for a material with the letter “G” assigned to column (1) of the Hazardous Materials Table (HMT; § 172.101). The HMR define a “technical name” as a recognized chemical or microbiological name currently used in scientific and technical handbooks, journals, and texts. Generic descriptions are authorized for use provided they readily identify the general chemical group or microbiological group.

Conversely, for a package containing a Division 6.2 material such as UN2814 or UN2900, the answer is no. The technical name should not be included on the outside of a non-bulk package in accordance with § 172.301(b). However, it should be noted that a Division 6.2 infectious substance with a “G” in column (1) of the HMT must have a technical name included in parentheses in association with the basic description on the shipping paper (see § 172.203(k)).

If the Division 6.2 material is assigned identification number UN2814 or UN2900 and is suspected to contain an unknown Category A infectious substance, the words “suspected Category A infectious substance” must be entered in parentheses in place of the technical name as part of the proper shipping description (§ 172.203(k)).

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,



T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division