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

<table>
<thead>
<tr>
<th>Title 49 Section 173</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>173.24</td>
<td>General Packaging</td>
</tr>
<tr>
<td>173.24a</td>
<td>Requirements for all HAZMAT</td>
</tr>
<tr>
<td>173.24a(c)</td>
<td>Changes regarding Infectious Substances and mixed content</td>
</tr>
<tr>
<td>173.134(b)</td>
<td>Exceptions for:</td>
</tr>
<tr>
<td>173.134(c)</td>
<td>Division 6.2 Packaging Regulated Medical Waste</td>
</tr>
<tr>
<td>173.196</td>
<td>Category A Infectious Substance</td>
</tr>
<tr>
<td>173.197</td>
<td>Regulated Medical Waste</td>
</tr>
<tr>
<td>173.199</td>
<td>Category B Infectious Substance</td>
</tr>
<tr>
<td>173.199</td>
<td>Category B Infectious Substance</td>
</tr>
</tbody>
</table>
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
UN Packaging
Division 6.2 Category A

- United Nations Symbol
- Box
- Fiberboard
- Different Primary Receptacle Allowed
- Infectious Substance Package
- Year Manufactured

4GU/CLASS 6.2/06
USA/+AA1869/APSS

- Country
- Manufacturer’s Code
- Test Facility’s Code

49 CFR 178.503(f)
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.
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)

49 CFR Part 172, Subparts D and E
Labeling Requirements

§ 173.134(c)(d) § 172.432

Category B infectious substance

UN3373

§ 173.199(a)(4)

3291

§ 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”
Compliance Inspections

NO NOTICE!!!!!!

Introduction / Invite your representatives

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

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

   Tested packages used (UN)          (Pkg 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

Stuart Streck
Investigator

Pipeline & Hazardous Materials Safety Administration
Office of Hazardous Materials Safety
Field Operations - Southern Region

233 Peachtree Street, N.E. Suite 602
Atlanta, GA 30303

Stuart.Streck@dot.gov
(404) 832-1141