

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



Infectious Substances Guide



U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration

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



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

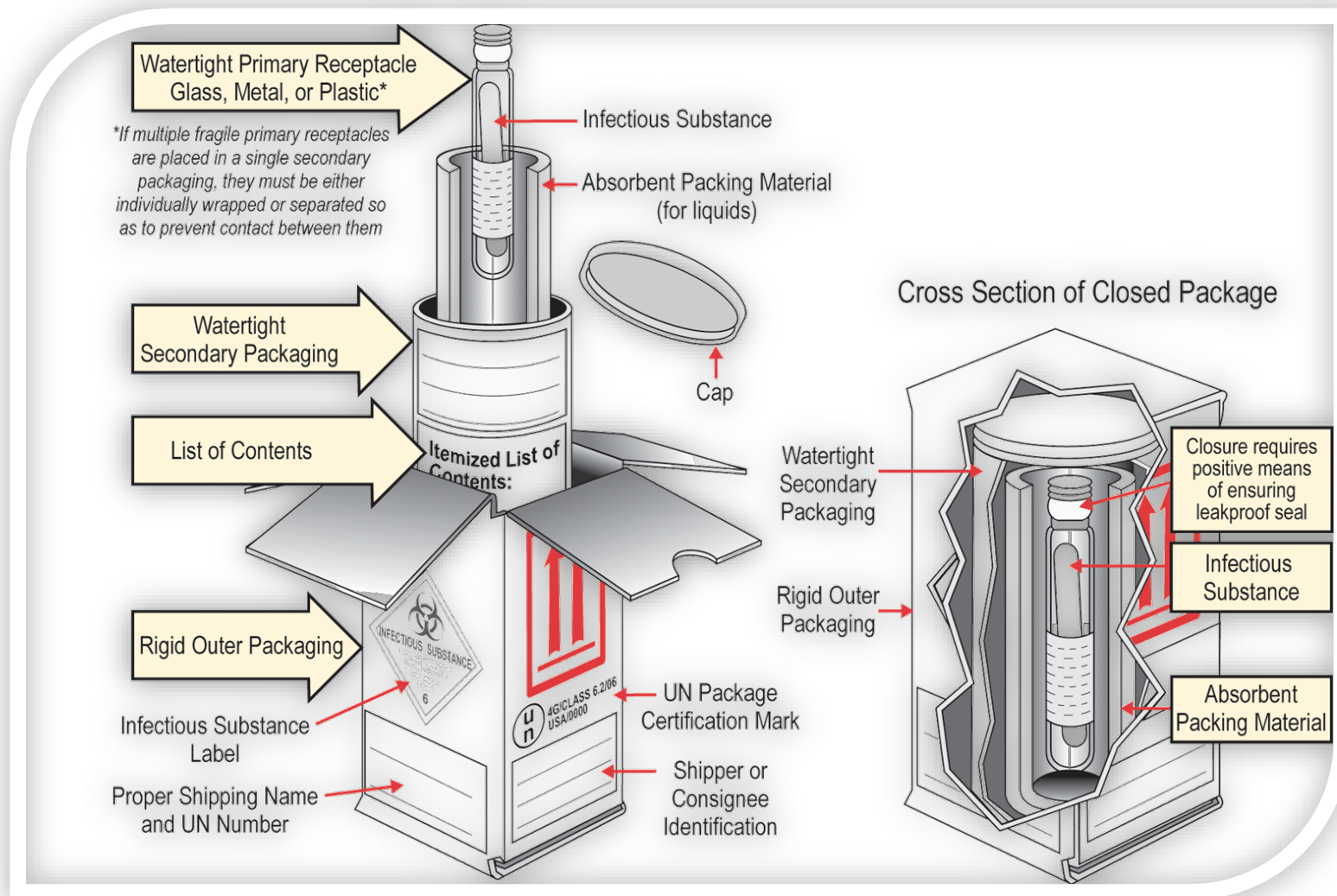


Other Pertinent References

- 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

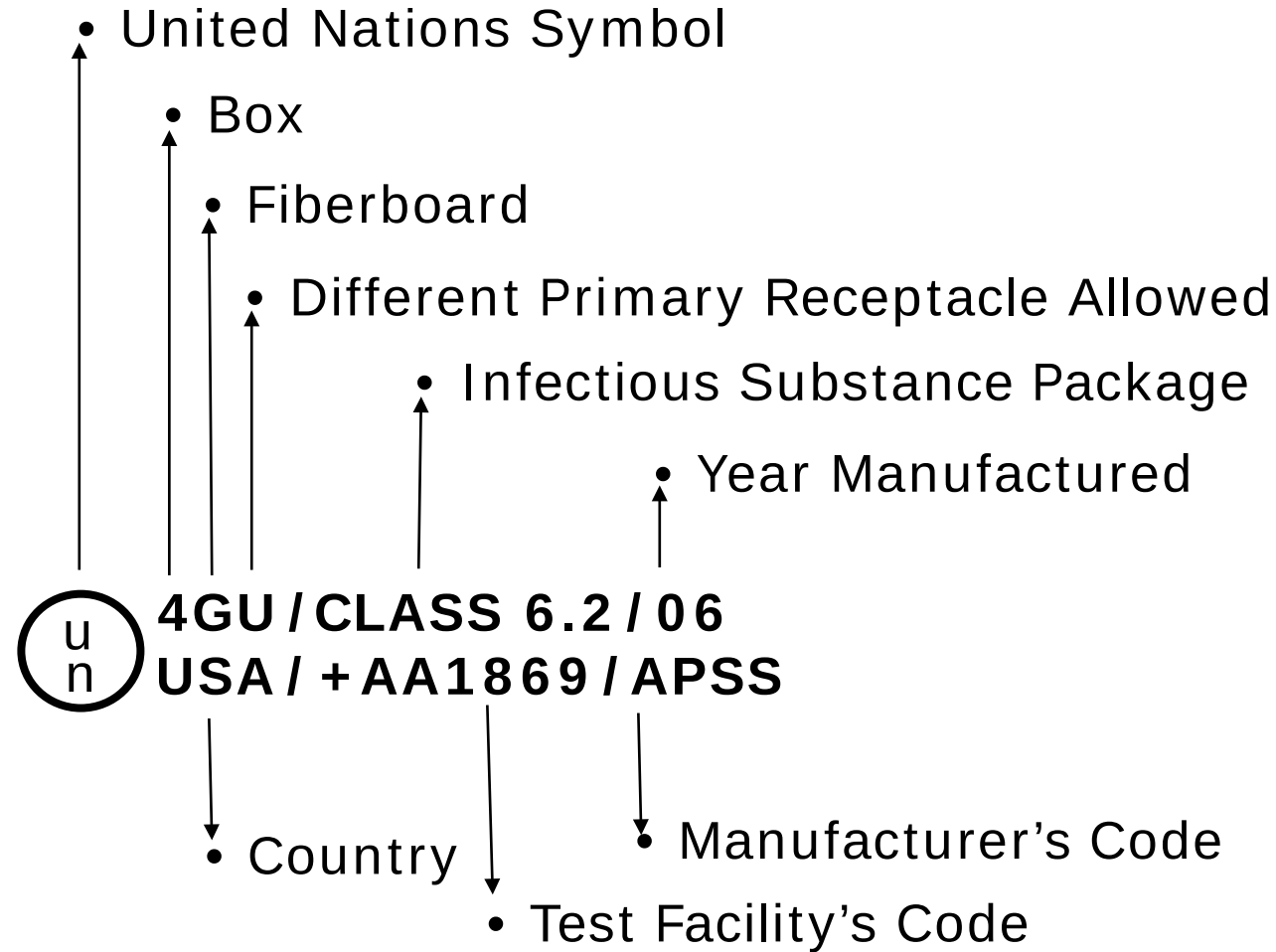


Category A Packaging



UN Packaging

Division 6.2 Category A



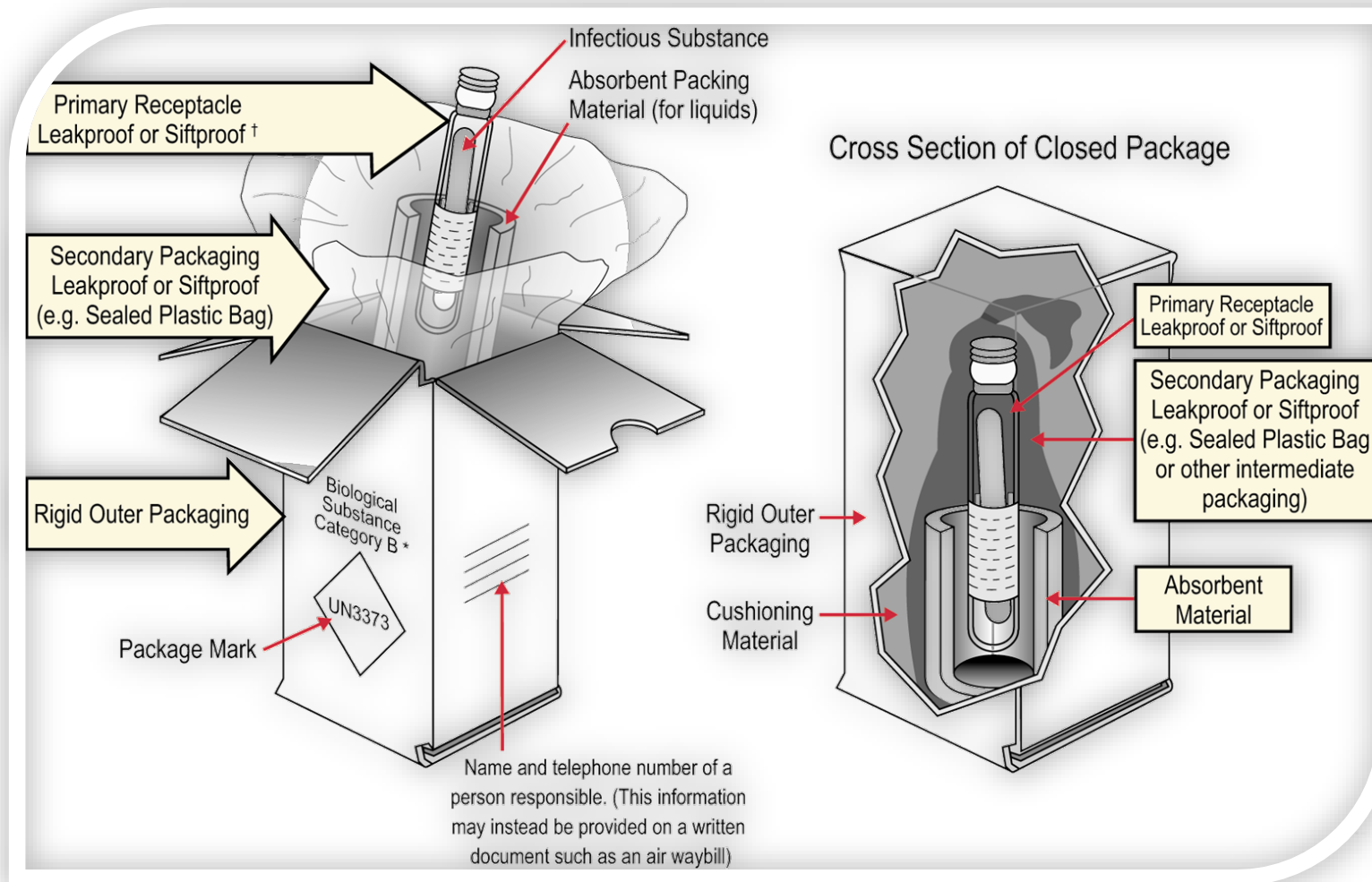
Testing of Packages

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



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



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 pkging/liners,

Tested packages used (UN) (Pkging 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

