

Transporting Infectious Goods Safely

CDC IPP Webcast

Atlanta, GA

December 4, 2019



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 (Tech name; generic microbiological group)

“or”

- UN2814 , Infectious substances, affecting humans, 6.2 (Tech name; generic microbiological group)

Category B Infectious Substance

- UN3373, Biological substance, Category B, 6.2



Packaging Requirements

173.24	General Packaging
173.24a	Requirements for all HAZMAT
173.24a(c)	Changes regarding Infectious Substances and mixed contents
173.134(b) 173.134(c)	Exceptions for: Division 6.2 Packaging Regulated Medical Waste
173.196	Category A Infectious Substance
173.197	Regulated Medical Waste
173.199	Category B Infectious Substance
178.609	6.2 Packaging Tests

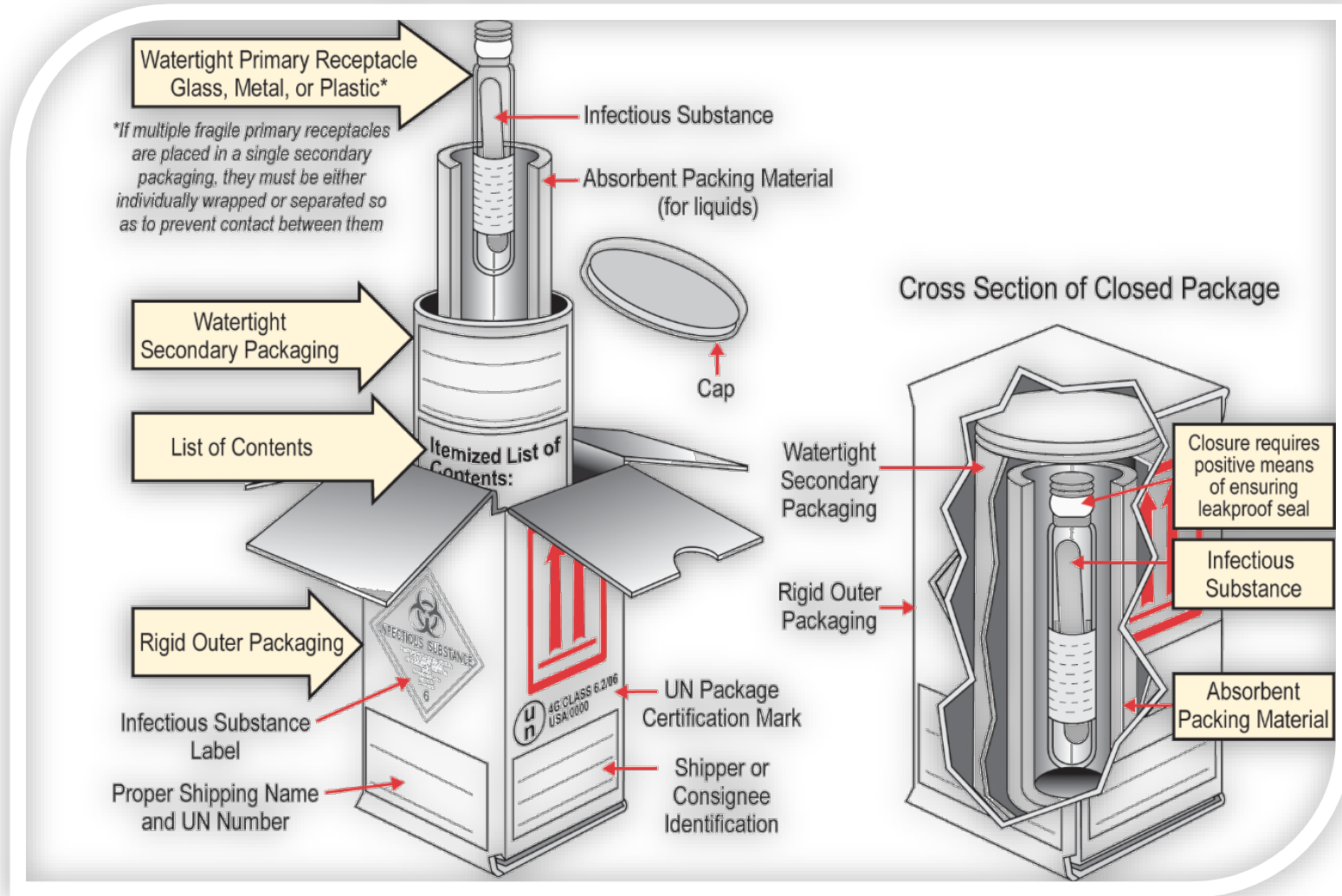


Other Pertinent References

- 171.15 Incident Reporting
- 172.203(k) Shipping paper Technical Name
(Tech name; generic microbiological group)
- 172.301(b) Package. No technical name
- 172.704(a) Hazmat Training
- 172.802 Transportation Security Plan Requirements
- 173.27 Aircraft Transportation

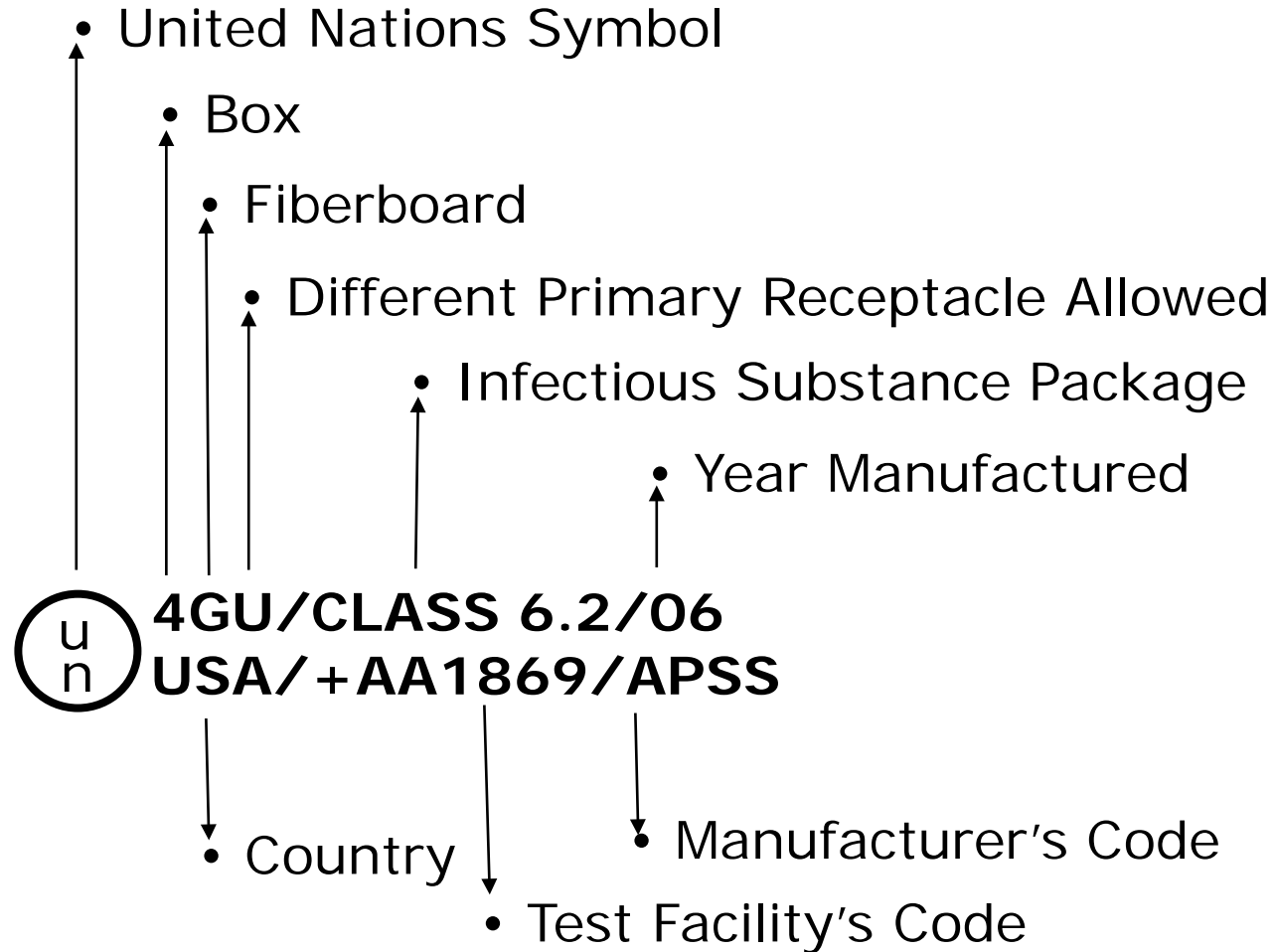


Category A Packaging



UN Packaging

Division 6.2 Category A



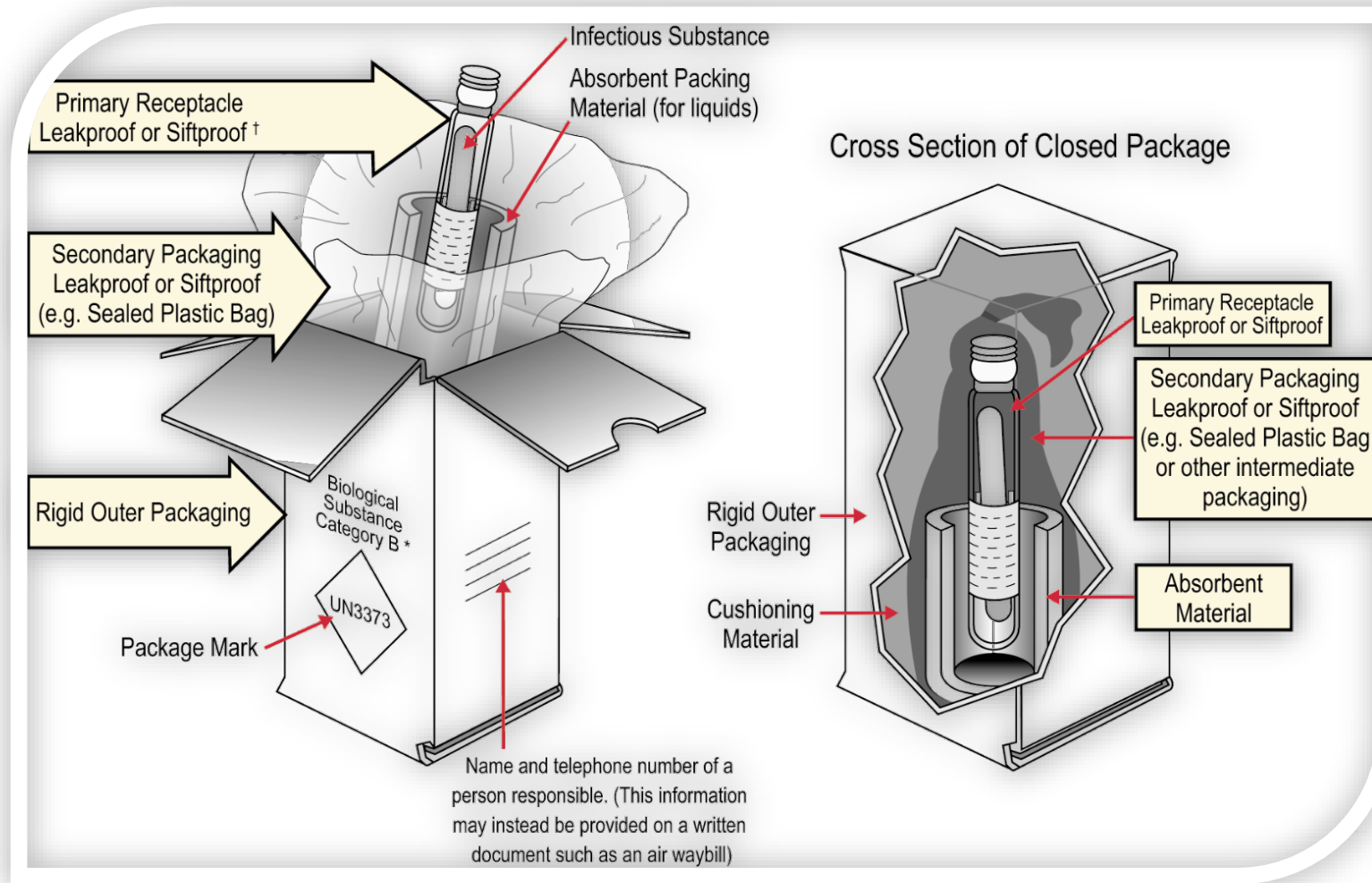
Testing of Packages

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
 - Generic microbiological group or
 - “Suspected Category A infectious substance”
(Lost in the crowd concept)
 - Hazard Class/Division
 - NO Packing Group
 - # and Type of Pkg / Weight (lbs. or kg)
 - 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

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!!!!!!

1. Introduction / Invite your representatives
2. Purpose / Tour facility: Inf Sub, Reg Med Waste, Chemical Waste, Radioactive Material
3. Packaging: Non-bulk, bulk, inner packaging/liners, Tested packages used $\textcircled{\begin{smallmatrix} U \\ n \end{smallmatrix}}$ [Packaging is Our specialty]
4. Documents: Bills of Lading
5. Training: Gen Awareness, Function Specific, Safety, Security Awareness and In-depth Security (if required).
6. Security Plan review (if required)
7. Exit Briefing: With or without violations noted.



Top Violations / Inspection Results

- Training
- Security Plan Requirements
- Emergency Response Telephone Number
- Covering packaging certification markings



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



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