



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

AUG 3 2007

400 Seventh Street, S.W.  
Washington, D.C. 20590

Mr. James A. Castrodale, Jr.  
Advanced Chemical Transports, Inc.  
12310 World Trade Drive, Suite 111  
San Diego, CA 92128

Ref. No.: 07-0140

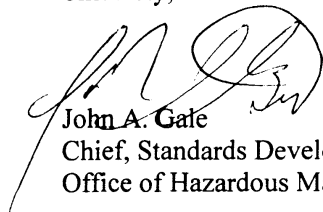
Dear Mr. Castrodale:

This is in response to your July 10, 2007 e-mail concerning the packaging requirements applicable to regulated medical waste (RMW) under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

"Regulated medical waste, n.o.s., 6.2, UN3291, PG II" must be packaged in accordance with the requirements of § 173.197. Generally, non-bulk packagings for RMW must be UN standard packagings conforming to the requirements of Part 178, at the Packing Group II performance level; the packagings must be marked in accordance with § 178.503 to certify that they conform to the applicable UN standard. The HMR include an exception from certain requirements for RMW, transported by a private or contract carriers (see § 173.134(c)). Under this exception, RMW may be transported in a rigid, non-bulk packaging that conforms to the general packaging requirements of §§ 173.24 and 173.24a and packaging requirements specified in Occupational Safety and Health Administration (OSHA) standards at 29 CFR 1910.1030. Each package must be marked with the OSHA "BIOHAZARD" marking shown in § 172.323, and with the proper shipping name, identification number, and additional information required in 49 CFR Part 172, Subpart D.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,



John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards



070140

173.197,  
173.134

**Drakeford, Carolyn <PHMSA>**

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**From:** INFOCNTR <PHMSA>  
**Sent:** Wednesday, July 11, 2007 2:22 PM  
**To:** Drakeford, Carolyn <PHMSA>  
**Subject:** FW: Information Center Comments/Questions

*Leary  
§ 173.197  
§ 173.134  
Regulated Medical Waste  
07-0140*

Carolyn,

Could you process this as a request for formal interpretation?

Erin

-----Original Message-----

From: Jcastrodale@advancedchemical.net [mailto:Jcastrodale@advancedchemical.net]  
Sent: Tuesday, July 10, 2007 8:38 PM  
To: INFOCNTR <PHMSA>  
Subject: Information Center Comments/Questions

Below is the result of your feedback form. It was submitted by James A Castrodale Jr. (Jcastrodale@advancedchemical.net) on Tuesday, July 10, 2007 at 20:38:14.

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Email: Jcastrodale@advancedchemical.net

Name: James A Castrodale Jr.

Category: Shippers-General Requirements for Shipments and Packagings (Sections 173.1 - 173.476)

Organization: Advanced Chemical Transports Inc,

Street: 12310 World Trade Dr. Suite 111

City: San Diego

State: California

Zip Code: 92128

Phone: 619-954-9392

Comments: I have a question about the changes found in PHMSA-2004-16895 (HM- 226A)] for 173.197. I would like to know if the below information is correct with the recent changes. I found this in a training for stericycle. We currently use DOT PG II approved containers and we have a problem with the UN certification stickers staying on the containers. According to the below training this is no longer required to be on the container. Is this true and is the below all that is required to be on the container?

Changes to Non-Bulk Packaging:

- Packaging Group certification requirements have been eliminated.
- Packaging only have to be PGII capable.
- UN string number no longer required for reusable or cardboard packagings.
- Packagings are only required to have the following markings:
  - Regulated Medical Waste;
  - UN 3291;
  - The biohazard symbol;
  - The word "BIOHAZARD".