

# Novel Coronavirus Disease 2019 (COVID-19) Medical Waste Transportation



## Waste Shipments - COVID-19

Due to the COVID-19 virus and subsequent decontamination efforts, rail carriers may see an increase in inquiries regarding transportation and/or shipments of medical waste to permitted medical waste disposal facilities. The following information is intended to assist you with any questions that may arise from these inquiries and/or shipments. Individual states may have additional requirements.

Medical waste is defined differently by many states and federal agencies. Under USDOT regulations\*, a regulated medical waste (RMW) is a waste or reusable material suspected or known to contain an infectious substance, and is generated in the diagnosis, treatment, immunization, or biomedical research of humans or animals.

\* USDOT Hazardous Materials Regulations (HMR) Title 49 CFR §173.197

### 49 CFR DOT Regulations

By USDOT regulations, an infectious substance is categorized as a Division 6.2 hazardous material. Division 6.2 material is defined as a material known or reasonably expected to contain a pathogen. A pathogen is a microorganism (including bacteria, viruses, rickettsia, parasites, fungi) or other agent, such as a proteinaceous infectious particle that can cause disease in humans or animals.

Infectious substances are listed as a Category A or B substance and are assigned four proper shipping names:

- Category A: An infectious substance in a form capable of causing permanent disability or life-threatening or fatal disease in otherwise healthy humans or animals when exposure to it occurs. A category A infectious substance must be assigned to either:
  - UN2814 Infectious substances, affecting humans
  - UN2900 Infectious substances, affecting animals
- Category B: An infectious substance that is not in a form generally capable of causing permanent disability or life-threatening or fatal disease in otherwise healthy humans or animals when exposure to it occurs.
  - UN3373 Biological substance
  - UN3291 Regulated medical waste, n.o.s. or Clinical waste, unspecified, n.o.s. or (BIO) Medical waste, n.o.s. or Biomedical waste, n.o.s., or Medical waste, n.o.s.

**Currently, the Centers for Disease Control and Prevention (CDC) along with OSHA consider wastes generated from COVID-19 as not falling under Category A infectious substances, and should be transported as a Regulated medical waste, n.o.s. (Category B).**

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Since the COVID-19 generated waste is considered a regulated medical waste (Category B), the following information applies to highway and rail shipments:

- PHMSA/USDOT HazMat Label for an Infectious Substance or OSHA BioHazard Symbol must be applied to non-bulk packages.
- Bulk packages must be marked with the OSHA BioHazard symbol on two opposing sides or ends (not bottom) if the packaging capacity is less than 1,000 gallons, and on each end and side if packaging has a capacity of 1,000 gallons or more.
- BioHazard markings on a bulk package must be clearly visible with orange colored background and symbols/letters in a black font of 6”.
- No placards are required for bulk shipments of Infectious substances – only the Infectious Substance or BioHazard Symbol markings. However, the shipping document MUST identify the appropriate UN number.

### UN3291, Regulated medical waste, n.o.s., 6.2, PGII



For information on how to prepare your workplace for COVID-19, consider viewing the following site - <https://www.osha.gov/Publications/OSHA3990.pdf>

#### References:

OSHA – Occupational Safety and Health Administration  
49 CFR – Title 49 Code of Federal Regulations – Transportation  
CDC – Centers for Disease Control and Prevention  
CDPH – California Department of Public Health  
NWWA – National Waste & Recycling Association  
HERC – Healthcare Environmental Resource Center