



## **Medical Waste Transporter Requirements**

A medical waste transporter is anyone who transports medical waste for business purposes by rail, air, vessel or highway. For purposes of this guidance, these types of transporters fall under two categories: commercial medical waste transporters and non-commercial medical waste transporters.

### ***Commercial Medical Waste Transporters***

Commercial medical waste transporters transport medical waste as a major part of their business. This type of transporter would include companies offering medical waste disposal services that pick up medical waste and transport it to a permitted facility to be treated and disposed of properly. Commercial medical waste transporters can only transport untreated medical waste to a medical waste treatment, storage or disposal facility that has been approved by the Colorado Department of Public Health and Environment (the Department) and the local governing body, or to an out-of-state medical waste treatment or disposal facility duly authorized by that state. Untreated medical waste from non-household sources may not be disposed of in a solid waste disposal facility unless the disposal facility is specifically designed and approved for these wastes. There are currently no solid waste facilities approved to accept untreated medical waste from non-household sources for disposal in Colorado.

Commercial medical waste transporters and those who prepare medical or infectious waste for shipment must comply with United States Department of Transportation (US DOT) requirements for Division 6.2 Infectious Substances, which includes US DOT regulated medical waste (49 CFR Parts 171-180). US DOT packaging, marking, labeling, placarding, shipping papers, and security plan requirements as well as US DOT awareness training (general awareness/familiarization, function-specific, safety, and security) must be met (49 CFR Parts 172 and 173). A US DOT brochure on transportation of Division 6.2 Infectious Substances is available at [http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Transporting\\_Infectious\\_Substances\\_brochure.pdf](http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Transporting_Infectious_Substances_brochure.pdf).

### ***Non-Commercial Medical Waste Transporters***

Non-commercial medical waste transporters transport medical waste generated or managed in the course of their business, but transportation is not their principal business. This type of transporter would include a nurse transporting used infectious sharps that were generated at an off-site flu clinic, a large animal veterinarian transporting medical waste from off-site animal care, and medical waste transported from a trauma scene by a cleanup contractor. Non-commercial medical waste transporters can self-transport their medical waste by private motor carrier to:

1. An accumulation site that is owned by the same business where medical waste is consolidated for pickup by a commercial medical waste transporter or for mailing to a medical or infectious waste mail-back service.
2. Directly to a medical waste treatment, storage or disposal facility.

Similar to the requirements for commercial medical waste transporters, non-commercial medical waste transporters and those who prepare medical or infectious waste for shipment must comply with US DOT requirements for transporting Division 6.2 Infectious Substances. However, non-commercial medical

waste transporters that transport small quantities of medical waste may be able to utilize the US DOT's Materials of Trade exception (49 CFR Section 173.6).

US DOT's Materials of Trade exception allows non-commercial medical waste transporters to transport small quantities of US DOT hazardous materials (other than hazardous waste) under reduced US DOT requirements. To qualify for the Materials of Trade exception, the transporter must:

1. Transport no more than 440 pounds (200 kg) of some US DOT Division 6.2 Infectious Substances (e.g., regulated medical waste and Category B infectious substances) and other hazardous materials at any one time; and
2. Meet Materials of Trade exception reduced packaging requirements; and
3. Meet Materials of Trade exception marking and labeling requirements.

If all of the requirements of the Materials of Trade exception are not met, then the transporter is subject to the more stringent US DOT Division 6.2 Infectious Substance requirements.

A US DOT Materials of Trade brochure is available at

<http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/mots05.pdf>. For additional information on US DOT transportation requirements or the Materials of Trade exception, contact the US DOT Hazardous Materials Information Line at 1-800-467-4922.

### **Other Requirements for the Transportation of Medical Waste**

Medical waste can be mailed through the United States Postal Service (USPS) only if the shipper uses a merchandise return service that is specifically authorized by the USPS to mail medical waste and sharps medical waste. The merchandise return/mail-back service provides the shipper with the appropriate receptacles, packaging, labeling and marking materials, and documentation to mail the package. The Department has a list of companies that provide mail-back services for sharps, red bag medical waste, and other common wastes on the Hazardous Materials and Waste Management Division's website.

Additionally, employees who may reasonably anticipate being occupationally exposed to blood, body fluids, or other potentially infectious materials during preparation of medical or infectious waste for shipment must comply with the Occupational Safety and Health Administration's (OSHA) Bloodborne Pathogens Standard (29 CFR 1910.1030). Information about OSHA's Bloodborne Pathogens Standard is available at <http://www.osha.gov/SLTC/bloodbornepathogens/index.html>.

### **Spills/Releases**

Transportation of medical waste must be conducted in a manner to prevent a spill or release of the waste and in a manner that does not result in nuisance conditions. Spills or releases of medical waste that occur during transportation must be cleaned up immediately by the transporter. Spills or releases to the environment and those exposing workers or the general public to potential infection must be reported to the Colorado Department of Public Health and Environment's 24-hour spill reporting hotline at 1-877-518-5608, to the local governing body having jurisdiction, and to the wastewater treatment facility where the spill or release occurred, if applicable, within twenty-four (24) hours. A written report describing the spill or release and the actions taken to remediate it must be submitted to the Department within fifteen (15) calendar days of the incident. Additionally, transportation-related spills or releases of medical waste must be reported to the National Response Center (NRC) at 1-800-424-8802. Spills or releases involving medical waste that contains an etiologic agent must be reported to the Centers for Disease Control (CDC) at 1-800-232-0124.

All medical waste transporters should be prepared in case of a spill or release of medical waste. The Department recommends that medical waste transporters develop and maintain a written spill management plan specific to the types of medical waste they transport. The spill management plan should include the types of medical waste that are transported by the carrier, written spill and release response and cleanup procedures, Emergency Response Guidebook (ERG) information, a list of supplies and equipment (including personal protective equipment) available to cleanup spills or releases, and emergency contact numbers to report the spill or release.

In addition to a written spill management plan, all regulated waste transporters should carry a spill kit that contains appropriate equipment and supplies for cleaning up a spill or release of medical waste. Although the spill kit contents will be specific to the types of medical waste transported, basic items should include absorbent materials, disinfectant, red biohazard bags, packaging that meet US DOT requirements, personal protective equipment (e.g. disposable gloves, face mask, goggles, apron), and a first aid kit.

\*\*\*\*\*

**For more information, please contact:**

Colorado Department of Public Health and Environment  
Hazardous Materials and Waste Management Division  
4300 Cherry Creek Drive South  
Denver, Colorado 80246-1530

Customer Technical Assistance Line:  
(303) 692-3320  
(888) 569-1831 ext. 3320 toll-free  
E-mail: [comments.hmwmd@state.co.us](mailto:comments.hmwmd@state.co.us)



Colorado Department  
of Public Health  
and Environment

Division website: [www.colorado.gov/cdphe/hm](http://www.colorado.gov/cdphe/hm)

\*\*\*\*\*

This information is intended to serve only as guidance to persons interested in understanding the transportation of medical waste in Colorado. This guidance must be consulted in conjunction with the Regulations Pertaining to Solid Waste Sites and Facilities, 6 CCR 1007-2, Part 1 and Colorado Revised Statute Title 25 Article 15 Part 4 to understand the full requirements for the management of medical waste. Other state and federal statutes and regulations also apply.