

DEPARTMENT OF THE ARMY  
U.S. ARMY MEDICAL DEPARTMENT ACTIVITY  
FORT HUACHUCA, ARIZONA 85613-7040

MEDDAC MEMORANDUM  
NO. 200-2

5 February 2001

Environmental Quality  
TRANSPORTATION OF MEDICAL HAZARDOUS MATERIAL  
AND HAZARDOUS WASTE (HM/HW)

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1. History: This issue publishes a revision of this publication.

2. PURPOSE: This memorandum provides guidance on the transportation of hazardous material, hazardous waste and outdated drugs.

3. APPLICABILITY: All MEDDAC elements and support elements.

4. REFERENCES:

a. Section 1-3, Part 260, Title 40, Code of Federal Regulations (CFR), Protection of the Environment (40 CFR 260.1thru 3).

b. Section 1-7, Part 261, Title 40, Code of Federal Regulations (CFR), Protection of the Environment (40 CFR 261.1thru 7).

c. Section 1-7, Part 262, Title 40, Code of Federal Regulations (CFR), Protection of the Environment (40 CFR 262.1thru 7).

d. Section 1-3, Part 263, Title 40, Code of Federal Regulations (CFR), Protection of the Environment (40 CFR 263.1thru 3).

e. Section 1-5, Part 172, Title 49, Code of Federal Regulations (CFR),

f. Transportation (49 CFR 172.1thru 5).

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\*This memo supersedes MEDDAC Memo 200-2 ,15 June 98

g. AR 200-1, Environmental Protection and Enhancement.

h. US Army Center for Health Promotion and Preventive Medicine (CHPPM) Technical Guide No. 126, Waste Disposal Instructions.

i. US Army CHPPM Medical Item Disposal Instructions on CD-ROM.

5. Responsibilities:

a. The Logistics Division will manage and implement this publication.

b. Preventive Medicine Wellness and Readiness Service (PMWARS), Environmental Science Officer or designee will provide consultation and will monitor this Memorandum.

c. Supervisors will ensure that employees adhere to this Memorandum when they move or transport hazardous material and/or waste.

6. General. Transportation requirements for hazardous medical material are listed in the Hazardous Materials Table in 49 CFR 172.101. The hazardous materials description and proper shipping names, hazard class, Department of Transportation (DOT) identification number of shipping, the required label, and specific requirements are given in the table. The rules for preparing and transporting hazardous medical material are outlined in 49 CFR 172 and must be adhered to.

a. The rules for transporting hazardous material are fairly clear; hazardous waste rules are more complex.

(1) The first step is to determine whether the item is a waste. An item becomes a medical waste under the following conditions:

(a) The material reaches its expiration date, no extension has been given (none is expected), the vendor will not exchange the item for credit, and the item is being prepared for disposal; or Logistics or PMWARS decides the item is not usable.

(b) The material is deemed as excess, reporting and advertising is completed, and disposal procedures are being implemented. Material reported as excess is not considered

waste until final disposition instructions have been received from the Defense Personnel Support Center (DPSC) or the U.S. Army Medical Material Agency (USAMMA), and there is no alternative but to dispose of the material. Whether the item has remaining shelf life is not important once the decision is made to dispose of the material. The Defense Reutilization Marketing Office (DRMO) or contractor treats them as waste for destruction purposes, and is destroyed according to procedures outlined in MEDDAC MEMORANDUM 200-2. More importantly, it ensures that the item is not resold, thereby limiting government liability

b. The next step is to determine whether the waste is hazardous according to federal, state, and local guidelines.

(1) Federally regulated hazardous wastes are identified in 40 CFR under the Resource Conservation and Recovery Act (RCRA). Acutely hazardous wastes are listed in 40 CFR 261.33(e); these will have an Environmental Protection Agency (EPA) hazardous waste number such as the letter P and 3 digits. Toxic wastes are listed in 40 CFR 261.33 (f); these will have an EPA hazardous waste number with the letter U and 3 digits. Other drugs will not be on the EPA lists but may have the characteristics of a hazardous waste (e.g., ignitable, corrosive, reactive, or EPA toxic) as described in Subpart C of 40 CFR 261.

(2) Other sources for determining whether an item is hazardous are the Medical Item Disposal Instructions (MIDI) (reference 3g) and US Army CHPPM Technical Guide 126, Waste Disposal Instructions (reference 3h). The MIDI indicates how the material is to be destroyed and generally states that the waste is a RCRA item, if applicable. The TG 126 lists those medical items that are to be managed as hazardous wastes; however, it does not provide a listing of all hazardous wastes. The technical guide does provide a complete listing of state environmental offices (including address and phone number) which you can contact in conjunction with the installation. The Environmental Coordinator is to determine whether the waste is state regulated as hazardous.

(3) If uncertain about whether an item is hazardous after following the first two steps, call the US Army CHPPM Waste Disposal Engineering Division at commercial (410) 436-3651, DSN 584-3651 and ask for a clarification, verification, or determination.

c. Having determined that the waste is hazardous, you are ready to begin shipping procedures. Pretransport (includes packaging, labeling, marking, and/or placarding), record keeping, and manifesting requirements in 40 CFR 262 will be followed when preparing hazardous waste for transport. Transportation requirements are specified in 49 CFR 172.

d. Hazardous material and waste listed in 40 and 49 CFR will be disposed of through DRMO. It is Army policy to use the DRMO for hazardous waste disposal unless extenuating circumstances warrant using an alternative source. The DRMO has the mission to contract for the disposal of hazardous material and waste.

e. A hazardous waste manifest (EPA Form 8700-22A or state equivalent) is required to transport, or offer for transportation, hazardous waste for off-site treatment, storage, and disposal (40 CFR 262 and AR 200-1, paragraph 6-4g).

(1) On-post transportation.

(a) The MEDDAC is responsible for transporting the hazardous waste within the installation boundary, including transportation to the DRMO.

(b) A hazardous waste manifest is not required to transport hazardous wastes within the installation boundaries except when public roads are used. The MEDDAC maintains a record (additional copies of DD Form 1348-6) of the date, time, and location of delivery; the quantities; the receiving facility; and the receiving official's name. This ensures a proper chain of custody.

(c) No deliveries of hazardous waste will be made without first notifying and obtaining approval from the receiving agency (DRMO). Delivery appointments are limited to Monday, Tuesday, and Wednesday, phone 533-7076.

(2) Off-post transportation. The Department of Labor is responsible for ensuring that off-post transportation complies with applicable federal, state, and local laws and regulations, including transportation of those hazardous wastes for which the DRMO or the installation has accountability and physical custody. The installation DOL, or designee, will arrange for

proper off-post transportation of hazardous waste consistent with state, federal, and Army requirements, the hazardous waste management plan, and RCRA permit conditions, in accordance with AR 200-1, paragraph 6-4g. This includes signing the hazardous waste manifest and complying with the manifest system and record keeping requirements.

f. When a contractor moves your hazardous waste (i.e., x-ray developer waste), the contractor must adhere to 40 CFR 263 and the relevant portions of the DOT rules in the 49 CFR 171 through 178. Note: When moving outdated non-hazardous drugs for disposal, use government vehicles, not privately owned vehicles.

g. PMWARS will consult the Installation Transportation Officer (ITO) when in doubt about the regulatory requirements for transporting hazardous material and waste. The ITO is the best source for advise on any special requirements, e.g., Section 172.504(c) of 49 CFR 172 states that trucks carrying less than 1,000 pounds of certain classes of hazardous materials do not need to be placarded. Consequently, when transporting a small amount of hazardous material from the warehouse to the health center or from the warehouse to the clinic, placarding is not needed.

h. Many medical items are safe, non-hazardous material when transported and stored; however, when offered for disposal, become hazardous wastes. These items, MIDI class HWA2 and A003, do not require management as a federally regulated hazardous waste. They may be disposed of IAW suggested methods in the MIDI and TG 126 using commercial contract. There is a commercial contractor currently contracted to accept, for disposal, the cytotoxic drugs that are not regulated as hazardous wastes on a cost-reimbursement basis. Outdated drugs classified as non-hazardous by the criteria given in the EPA rules that implement the RCRA are disposed of through the Commercial Contractor. Liquid medicinal wastes, whether hazardous or not, are not permitted at the landfill. Documentation pertaining to the disposal methods prescribed should be retained on file and updated every 2 years. Additional consultative assistance with the disposal of cytotoxic drugs may be obtained by calling US Army CHPPM Waste Disposal Engineering Division, (410) 671-3651, DSN 584-3651.

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j. Some confusion exists concerning the distinction and use of various numbers in the hazardous waste regulations and in the DOT regulations. For regulated hazardous wastes, the EPA provides designated EPA hazardous waste numbers. Examples include P042 for epinephrine which is an acutely hazardous waste; U122 for formaldehyde which is a toxic waste; and D001 which is a hazardous waste with the characteristic of ignitability. The EPA also provides six different hazard codes, which are (I), (C), (R), (E), and (T), as described in 40 CFR 261.30. For example, (I) stands for ignitable. The EPA hazardous waste numbers and the EPA hazard codes each have different uses. The former are used on the Uniform Hazardous Waste Manifest form; the latter merely show the basis for listing a hazardous waste.

The proponent of this publication is the PMWARS. Users are invited to send comments and suggested improvements on DA Form 2028 directly to the Preventive Medicine Wellness and Readiness Service, ATTN: MCXJ-PM, USA MEDDAC, Fort Huachuca, AZ, 85613-7040.

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