



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

JUL 17 2006

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

Mr. Victor Anderson  
Solutions, Inc.  
P.O. Box 1091  
Prospect, KY 40059

Reference No. 06-0139

Dear Mr. Anderson:

This is in response to your June 21, 2006 e-mail concerning whether or not wheeled carts for "Regulated medical waste, 6.2 (infectious), UN 3291, PG II" (RMW) may have a closed drain plug in the bottom of the cart and meet the performance criteria for an authorized packaging under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state the surface of the drain plug is smooth within the cart and the wheeled cart meets all the applicable performance criteria required for this packaging under the HMR.

The answer is yes. Provided the interior of the surface remains smooth such that it does not reduce the effectiveness of its inner packagings, and the container meets the performance criteria under § 173.197 and all other applicable requirements under the HMR, it is the opinion of this office that the wheeled cart you describe is an authorized RMW packaging under the HMR.

Sincerely,

Hattie L. Mitchell, Chief  
Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



060139

173.197

Edmonson  
§173.197  
Regulated Medical Waste  
06-0139

**Edmonson, Eileen <PHMSA>**

**From:** Victor Anderson [vanderson@a-solutionsinc.com]  
**Sent:** Wednesday, June 21, 2006 4:27 PM  
**To:** Edmonson, Eileen <PHMSA>  
**Subject:** RE: Informal Response: Wheeled Cart with Interior Plug

Edward T. Mazzullo, Director, Office of Hazardous Materials Standards, Pipeline and Hazardous Materials Safety Administration, 400 7th Street, SW, PHH-10, Washington, DC 20590-0001

Dear Mr. Mazzullo

I would like to know whether or not wheeled carts for "Regulated medical waste, 6.2 (infectious), UN 3291, PG II" (RMW) may have a closed drain plug in the bottom and meet the performance criteria for an authorized packaging under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180)?

Please respond to me at;  
Solutions Inc.  
P.O. Box 1091  
Prospect, KY. 40059  
vanderson@a-solutionsinc.com

Thank You  
Victor Anderson