



U.S. Department  
of Transportation  
Pipeline and Hazardous Materials  
Safety Administration

1200 New Jersey Ave., SE  
Washington, DC 20590

OCT 30 2008

Ms. Carolie Horvath  
Henry Ford Hospital  
2799 W. Grand Blvd.  
Detroit, MI 48202

Ref. No. 08-0247

Dear Ms. Bassine:

This is in response to your September 29, 2008 email regarding the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-180) to the transportation of chemotherapy medications.

In your email, you state that you have reviewed the Material Safety Data Sheet (MSDS) for a few select chemotherapy medications and the shipping information for these agents indicates that the materials are "not DOT regulated." You request whether these chemotherapy medications transported by same-day local courier service are regulated under the HMR. You also request guidance on proper packaging and hazardous communication to transport these materials in accordance with the HMR.

It is the opinion of this Office that the materials described in your letter do not meet the definition of a hazardous material and, therefore, are not required to be transported in accordance with the HMR.

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Gorsky".

Susan Gorsky  
Acting Chief, Standards Development  
Office of Hazardous Materials Standards

**Drakeford, Carolyn <PHMSA>**

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**From:** INFOCNTR <PHMSA>  
**Sent:** Monday, September 29, 2008 10:18 AM  
**To:** Drakeford, Carolyn <PHMSA>  
**Subject:** FW: Information Center Comments/Questions

Foster  
§ 172.101  
§ 173.197  
Regulated Medical Waste  
J 08-0247

Carolyn,  
Another request for interpretation.  
Thanks,  
Rob

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

From: Chorvat1@hfhs.org [mailto:Chorvat1@hfhs.org]  
Sent: Friday, September 26, 2008 2:00 PM  
To: INFOCNTR <PHMSA>  
Subject: Information Center Comments/Questions

Below is the result of your feedback form. It was submitted by Carolie Horvath (Chorvat1@hfhs.org) on Friday, September 26, 2008 at 13:59:47.

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Email: Chorvat1@hfhs.org

Name: Carolie Horvath

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

Organization: Henry Ford Hospital

City: Detroit

State: Michigan

Zip Code: 48202

Phone: 313-916-8749

Comments: I had contacted Hazmat via telephone on two separate occasions, and have gotten information that is unclear to me, and I am hoping for a written response. Our hospital will be sending chemotherapy drugs, via same day local courier service, to our satellite sites (within a 30 mile distance). I have examined 49 CFR Part 172/173, and am unsure if chemotherapy medications fall under Class 6.1 Toxic substances. I have reviewed a few MSDS sheets for a few select chemotherapy medications, and the shipping information for these agents states "not DOT regulated", keeping in mind that these substances can be irritating on contact. So, I remain unclear as to which regulations need to be followed, if any, for sending these medications via courier. Are they exempt (meaning they do not classify as 6.1 Toxic)? I had assumed, perhaps wrongly so, that all chemotherapy medications were Class 6.1. We want to ensure our compliance with any applicable regulations for shipping and pack!

aging these medications. Can you please provide some direction on how to properly package and label these medications? Some of the medications will be sent in vials, and others will be reconstituted in an IV bag.

Thank you in advance for any assistance that you can provide.