

From: David Tran <David.Tran@danielshealth.com>
Sent: Thursday, July 3, 2025 2:14 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Cc: Kyle Little <KLittle@danielshealth.com>; Jennifer Vaisnoras <Jennifer.Vaisnoras@danielshealth.com>
Subject: Daniels Sharpsmart, Inc. - Formal Letter of Interpretation

Hello,

I hope you are doing well! Daniels Sharpsmart, Inc. (Daniels) is requesting a formal letter of interpretation regarding Daniels' current hazardous materials shipping paper process and procedures and compliance with the hazardous materials regulations ("HMR") (49 CFR § 177.817 **Shipping papers**).

Please see attached our request letter addressed to Mr. Shane Kelley. Please let us know if this needs to be submitted elsewhere or via another method of communication. We look forward to hearing from HMIC, thank you!

Regards,

David Tran
Compliance Specialist
Daniels Health | North America

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Daniels Sharpsmart, Inc.
111 W. Jackson Blvd. Suite 1900
Chicago, IL 60604



July 03, 2025

Mr. Shane Kelley

Director, Standards and Rulemaking Division

U.S. DOT/PHMSA (PHH-10)

1200 New Jersey Avenue, SE East Building, 2nd Floor

Washington, DC 20590

RE: Daniels Sharpsmart Inc. – Request for a Formal Letter of Interpretation - Hazardous Materials Shipping Paper Process

Dear Mr. Kelley,

Please accept this letter on behalf of Daniels Sharpsmart, Inc. (dba “Daniels”) as a request for a formal letter of interpretation regarding Daniels’ current hazardous materials shipping paper process and procedures and compliance with the hazardous materials regulations (“HMR”) (49 CFR § 177.817 **Shipping papers**). Daniels provides essential waste management services to the healthcare industry in North America. Specifically, Daniels specializes in the safe containment, transport, and processing of healthcare generated wastes (UN 3291 Regulated Medical Waste, n.o.s, 6.2, PG II). We provide the safest and most sustainable containers in the world for the packaging of regulated medical waste to minimize risk to healthcare workers and reduce environmental impact. At the request of the Minnesota Pollution Control Agency (MNPCA), Daniels seeks confirmation from the U.S. DOT/PHMSA that its current hazardous materials shipping paper process and procedures in relation to shipments of regulated medical waste is consistent with and complies in all respects with the HMR. Where used in this request letter, “manifest” will be equivalent to “shipping paper” as defined by the HMR for all intents and purposes.

Daniels utilizes an electronic manifesting system called Enwis. Enwis is a part of the Microsoft Dynamics 365 Business Central technology platform, powered by the Tegos Group. Enwis allows Daniels to generate and provide electronic copies of shipping papers to our customers for each shipment of hazardous materials. The use of digital manifesting allows for an increase in sustainability and efficiency while reducing costs and the potential for human error. An example of the digital shipping paper used by Daniels is included in this letter as “Enclosure A.” This digital shipping paper has been formatted to meet the requirements of § 172.202 **Description of hazardous material on shipping papers** and § 172.204 **Shipper’s certification**.

The procedure for how the Enwis electronic manifesting system is utilized is provided below:

- The Enwis system stores customer information (such as address, phone number, email, etc.) provided to our customer service team by each customer.
- When customers request pick-ups, our customer service team puts together a list of customer stops for a Daniels driver to complete. This list is coordinated in the Enwis system and are put together daily.

- The Daniels driver will “service” each customer on their route. Drivers utilize a handheld device that prompts the entry of information such as container number and types of packages as required to complete the information on the manifest at the time of pickup.
- Finally, the driver digitally collects a name and signature from the customer to complete the “service” on the handheld device. The moment the driver hits “submit,” a copy of the manifest is emailed to the customer. A second copy of the electronic manifest is also sent to the customer when the shipment is delivered to its intended destination.

In addition to the process above and as required by § 177.817 (e) **Shipping paper accessibility—accident or inspection**, Daniels also accompanies each shipment of hazardous materials with a physical, hard-copy “supplementary manifest.” This physical shipping paper is provided and made readily available to, and recognizable by, authorities in the event of an accident or inspection. Included in this letter as “Enclosure B,” the supplementary manifest has also been formatted to meet the requirements of § 172.202 **Description of hazardous material on shipping papers** and § 172.204 **Shipper's certification**. Meeting all the requirements above as applicable to shipping papers in the HMR, the supplementary manifest provides a summary of all hazardous materials shipments offered and accepted for transport on each route. In addition to use of the electronic manifesting procedure, a driver carries and completes a supplementary manifest for each route. It is completed and updated with each shipment the driver accepts, outfitted with required information by both the driver and shipper/customer.

Given the description of our current hazardous materials shipping paper process and procedures in relation to shipments of regulated medical waste above, we are requesting a formal letter of interpretation regarding whether this process is consistent with and complies with applicable HMR requirements. Please feel free to reach out should you have any additional questions; we look forward to hearing from you soon.

Sincerely yours,

Daniels SharpSmart, Inc.
111 W. Jackson Blvd. Suite 1900
Chicago, IL 60604
www.danielshealth.com
E: compliance@danielshealth.com



Daniels Sharpsmart, Inc.
1087 Park Pl Ste 150
SHAKOPEE, MN, 55379

Phone : 651-796-3565
Fax No. :
For Chemical Emergency
Spill Leak Fire Exposure or Accident
Call CHEMTREC Day or Night
1-800-424-9300

Manifest # WMO10417289
Customer # BP004706/BPS015090
Date # 06/02/25
Route # 01 - Monday Eagan



Generator : High Point Surgery Center 8650 Hudson Blvd N Suite 235 LAKE ELMO, MN, 55042 Phone : 6513382221 RO # : 1539-2	Carrier : Daniels Sharpsmart Inc. dba Daniels Health 111 West Jackson Blvd. Ste 1900 Chicago, IL, 60604 Phone : 888-952-5580 Vehicle Decal:	Transporter Permits: US DOT# 1295076 US DOT # 1295076 IL - #M9059 WI - #15412 MO - #20G1001000	IA - N/A MN - #MPCA IW-166 ND - WH-1735
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Destination Facility : Daniels Sharpsmart, Inc. 1087 Park Pl Ste 150 SHAKOPEE, MN, 55379 Phone : 651-796-3565 Permit # : IW-717	Alternate Destination Facility : Covanta Huntsville, Inc. 5251 Triana AL Blvd HUNTSVILLE, AL, 35803 Phone : 256-882-1019 Permit # : 709-1104	Alternate Destination Facility : ,, Phone : Permit # :	Transfer Facility : ,, Phone : Permit # :
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Waste Collected : UN 3291 Regulated Medical Waste n.o.s. 6.2 PG II OR

SHARPS Waste Collection :	Totals :	RMW Waste Collection :	Totals :
<u>Product :</u>	<u>Driver Qty</u> Total Sharpsmart Containers: 0 Estimated Gross Wt (at Pickup): 0.00 Sharpsmart Actual net Wt:	<u>Product :</u>	<u>Driver Qty</u> Total RMW Containers: 0 Estimated Gross Wt (at Pickup): 0.00 RMW Actual net Wt:

Enclosure A

Transporter IDs Returned	(LG)	(MED)	(SM)
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Clean Products Delivered :	Clean Products Delivered :
<u>Product :</u> 200 Gal RMW	<u>Product :</u> 200 Gal RMW
<u>Ordered :</u> 3	<u>Qty. Delivered</u> 0

Date Last Serviced	Next Service :	Notes Comments or
05/29/25	06/04/25	Discrepancies :

Generator Certification :

I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name, and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

I further declare that this shipment of waste is free of hazardous and mercury waste as defined by the US code of federal regulations and/or appropriate state rules and regulations.

Generator (Customer) :

Name of authorized person (print):	Signature	Date
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Route Driver :

Name of authorized person (print):	Signature	Date
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Transfer Driver : (if applicable)

Name of authorized person (print):	Signature	Date
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Certificate of Receipt :

Name of authorized person (print):	Signature	Date
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Certificate of Destruction :

Name of authorized person (print):	Signature	Date
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SUPPLEMENTARY MANIFEST

For Chemical Emergency: Spill Leak Fire Exposure or Accident
Call CHEMTREC Day or Night **1-800-424-9300**

Date : 8/4/2025

Route : RT00040931 - 01 - Monday SQ

Destination Facility	Permit #	Telephone #
Daniels Sharpsmart, Inc., 1087 Park Pl Ste 150, SHAKOPEE, MN, 55379	IW-717	651-796-3565

Carrier	Carrier DOT	Telephone #
Daniels Sharpsmart, Inc., 1087 Park Pl Ste 150, SHAKOPEE, MN, 55379	US DOT# 1295076	651-796-3565

Waste Collected:	UN 3291 Regulated Medical Waste, n.o.s. 6.2, PG II	Or _____
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Shippers Certification *	I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations
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Daniels Manifest #	Shipper Name	Shipper Address	Telephone #	Date of Shipment	No. of Packages	Type of Package	Weight (LB)	Shippers Signature*

Enclosure B