



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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

OCT 19 2001

Ms. Barbara Konrad
Manager, Transportation Regulatory Affairs
Honeywell
P.O. Box 10957
Morristown, NJ 07962-1057

Ref. No. 01-0214

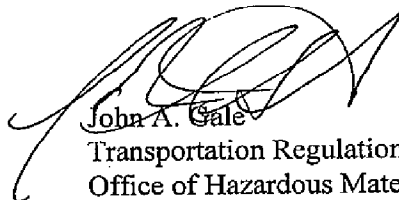
Dear Ms. Konrad:

This is in response to your letter asking if the aerospace equipment contaminated with blood and human remains that your company collects from accident sites is regulated as an infectious substance under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You stated that your company has no reason to believe these items meet the definition in § 173.134 for an infectious substance.

Your understanding is correct. Provided the aerospace equipment is not contaminated with other material within the aircraft that meets the definition of an infectious substance, such as an infectious substance package that has released its contents, it would not be regulated under the HMR.

I hope this satisfies your request.

Sincerely,



John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards



010214

Honeywell

Honeywell
P.O. Box 1057
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Edmonson
§ 173.134
Classification
01-0214

August 14, 2001

Research and Special Programs Administration
Office of Hazardous Materials Standards (DHM-10)
US Department of Transportation
400 Seventh Street SW
Washington, DC 20590-0001

**Subject: Interpretation on Infectious Substance Classification
Equipment Contaminated With Human Remains**

Dear Sir or Madam:

After an aircraft accident, Honeywell International teams are sometimes deployed to crash sites to collect, package and ship Honeywell aerospace components and equipment damaged in the wreck. Some pieces of equipment are contaminated with blood and/or pieces of human remains.

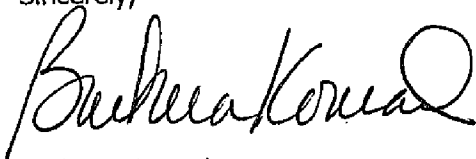
We believe these shipments do not meet the DOT definition of infectious substance (class 6.2) under 49 CFR 173.134.

We base our conclusion on the following facts: (1) We have no reason to believe or suspect that the blood or remains would cause any severe, disabling or fatal disease; (2) We have no reason to suspect that any of the blood or remains contained any agent listed in 42 CFR 72.3; (3) We are not shipping the blood / remains for diagnostic purposes; (4) The blood / remains were certainly not prepared or manufactured in accordance with 9 CFR or 21 CFR regarding biologic or drug products; and (5) the blood / remains are not regulated medical waste since they were not generated in any of the means listed in 49 CFR 173.134 (a)(4).

We do not see any specific exception for blood or human remains (other than for a corpse or body part destined for interment or cremation) but believe these materials do not meet the definition of class 6.2 under DOT rules and the equipment contaminated with this material can therefore be shipped "not regulated".

Please let us know if you concur with our assessment of this situation.

Sincerely,



Barbara Konrad
Manager, Transportation Regulatory Affairs

me: 913-895-8000