



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

JUN 24 2003

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

Mr. Stan Turbyfill
Director of Safety
Brink's U.S.
555 Dividend Drive, Suite 100
Coppell, Texas 75019-4959

Ref. No: 03-0139

Dear Mr. Turbyfill:

This is in response to your June 2, 2003 letter asking whether currency collected from banks that has been contaminated by a variety of substances (e.g., blood, body fluids, sewage, dye pack chemical, etc.) would be regulated as an infectious substance under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state that your company has no reason to believe this currency, which is transported to the Federal Reserve for destruction, meet the definition in § 173.134 for an infectious substance.

As you state, the HMR define an "infectious substance" in § 173.134 as a material known to contain or suspected of containing a pathogen that has the potential to cause disease in humans or animals. Therefore, based on the information you provided, the soiled currency do not meet the definition of an infectious substance in § 173.134 because there is no reason to know or strongly suspect the currency contain an infectious substance.

I hope this satisfies your request.

Sincerely,

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



030139

173.134



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Beatts
§ 173.134
Infectious Substances
03-0139

Stan Turbyfill
Director of Safety

June 2, 2003

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 Contaminated Currency and Infectious Substance Classification
Currency Contaminated with Human Blood or Body Fluids**

Dear Sir or Madam:

On occasion banks receive currency that has been mutilated or contaminated by a variety of substances. The most common contaminants are blood, body fluids, sewage, and dye pack chemical, while less frequent items are water, mold, chemicals or other substances that make the currency unsuitable for circulation. The bank personnel usually remove the "contaminated currency" and double bag it in heavy-duty, tamper-resistant, clear plastic security bags. The bags in turn are labeled for shipment and transported to the Federal Reserve for destruction.

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

We base our conclusion on the following facts:

- We have no reason to believe or suspect that the blood or bodily fluids or other contaminants would cause any severe, disabling or fatal disease;
- We have no reason to suspect that any of the blood or contaminants contained any agent listed in 42 CFR 72.3
- We are not shipping the contaminated currency for diagnostic purposes;
- The blood/fluids were not prepared or manufactured in accordance with 9 CFR or 21 CFR regarding biologic or drug products; and
- The contaminated currency appears to meet conditions consistent with other exceptions of Division 6.2 materials granted per 173.134 (b).
- The potential exposure is minimal due to the airtight, tamper resistant sealed double-bag packaging.

Furthermore, We believe that it is in the interest of public safety for "Contaminated Currency" to be shipped under armed escort to prevent theft and reintroduction into circulation.

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

Sincerely,

Stan Turbyfill
Director of Safety