



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

OCT 8 2004

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

Mr. David J. Allard, CHP, Director
Bureau of Radiation Protection
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 8469
Harrisburg, PA 17105-8469

Ref. No. 04-0197

Dear Mr. Allard:

This responds to your August 31, 2004 letter requesting clarification on the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to household wastes that have been contaminated with short-lived medical radionuclides and the use of DOT Exemption 11406. Specifically, you ask whether these contaminated household wastes are regulated as Class 7 hazardous materials under the HMR.

According to your letter and previous email correspondence with this office, some household wastes may become radiologically contaminated by patients (human and animal) who have undergone nuclear medicine procedures, and released to go home. Based on information previously provided to you by this office, it is your understanding that household wastes are not regulated under the HMR. Your understanding is correct. Household wastes, including household wastes contaminated with short-lived radionuclides, are not subject to the HMR.

I hope this answers your inquiry.

Sincerely,

Edward T. Mazzullo
Director
Office of Hazardous Materials Standards

RECEIVED
O4 OCT 13 PM 3:50
AAU/PROT
DIRECTOR'S OFFICE