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# Hazardous Materials/Transportation: U.S. Pipeline and Hazardous Materials Safety Administration Addresses Status of Sanitary Sewage/Sewage Sludge

## Arkansas Environmental, Energy, and Water Law Blog

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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed the applicability of the federal Hazardous Materials Regulations ("HMR") to the transportation of sanitary sewage and sewage sludge in a May 19<sup>th</sup> letter.

The St. Johns County Utility Department (Florida) ("St. Johns") stated in February 2<sup>nd</sup> correspondence that it was considering hiring:

... contract hauling for the transportation of sanitary sewage and sewage sludge from one wastewater plant to another for further processing.

St. Johns informed PHMSA that one of its potential contractors was:

... concerned these materials could be classified as a hazardous material under the infectious substance definition.

St. Johns asked whether sanitary sewage and sewage sludge are regulated as a Division 6.2 infectious substance under the HMR?

The PHMSA responded in the negative stating:

As provided in § 173.134(b)(13)(ii) and (iii), any waste or recyclable material other than regulated medical waste, including sanitary waste or sewage, and sewage sludge or compost, are not subject to the requirements of the HMR as Division 6.2 materials.

[Click here to download a copy of the May 19<sup>th</sup> letter.](#)