



U.S. Department  
of Transportation

Pipeline and Hazardous  
Materials Safety  
Administration

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

MAY 19 2016

Tony Cubbedge  
Environmental Division Manager  
St. Johns County Utility Department  
1205 SR 16  
St. Augustine, FL 32084

Ref. No.: 16-0019

Dear Mr. Cubbedge:

This letter is in response to your February 2, 2016, email requesting the applicability of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) to the transportation of sanitary sewage and sewage sludge. In your email, you state that you are looking to hire contract hauling for the transportation of sanitary sewage and sewage sludge from one wastewater plant to another for further processing. You note that one of your potential contractors is concerned these materials could be classified as a hazardous material under the infectious substance definition. Specifically, you ask whether sanitary sewage and sewage sludge are regulated as a Division 6.2 infectious substance under the HMR.

The answer is no. 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.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division