Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Clarifying the Infectious Substance Requirements



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

09/03/2025

The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in an August 7th Interpretive Letter the application of the federal Hazardous Materials Regulations ("HMR") to the transportation of Division 6.2 (Infectious substance) materials. See Reference No. 25-0063.

PHMSA was responding to an April 21, 2025, email from the Transportation Development Group LLC ("TDG").

TDG requested clarification on the transportation of HIV+ blood for the purposes of an autologous blood transfusion. The company asked whether it is subject to the requirements of the HMR.

PHMSA responded that §173.134(b) list materials are not subject to the HMR as Division 6.2 Infectious substances. This is stated to include in accordance with §173.134(b)(7), blood, regardless of whether it contains an infectious substance, collected for the purposes of a blood transfusion.

A copy of the Interpretive Letter can be found here.