

RMW Safety Assessment Methodology (SAM)

Requested By: S. Ferrone/B. Pyatt
Department/Division: Medical
Principal Investigator: N/A

Date of Transfer: Open From Building/Area:
Time of Transfer: To Building or Area: 490

Safety Assessment (Chapter 5 of the HMTM provides detailed guidance).

1. Material Characteristics/Classification

Name: (e.g., Commercial, CAS): Regulated Medical Waste

Quantity: (usually 2-3 sharps boxes, 2-BB's, 3 ICC's)

Type of Container: Sharps containers, biohazard bags, Ice Cream Containers, Boxes

Radioactive: Yes No

Isotopes of Concern and Estimated Level of Activity:

Does the material contain fissile isotopes in excess of 125 g U-235, 80 g U-233, 80 g Pu, or in combination such that $g\ U-235/125 + g\ U-233/80 + g\ Pu/80 > 1$? Yes No

If yes, the BNL Criticality Safety Officer must evaluate the material for criticality safety measures and controls.

Is the material hazardous, as defined in 49 CFR 172.101, Chapter 6 or Chapter 7 of the HMTM? Yes No

If yes, then you are required to continue this safety assessment analysis unless the material meets one of the following criteria:

- The transfer is covered by Subject Areas and has previously been evaluated for transfer by the Isotopes and Special Materials Group, Shipping and Receiving, Waste Management Division, or the Transportation Safety Officer (TSO).
- The transfer is routine and has been previously evaluated for transfer.
- Material is defined as a Material of Trade or is a Small Quantity Exempted.

What is the materials classification: Hazard Class: 6.2 UN #: 3291

2. Material Hazard Assessment

What hazard does your material pose? (See Chapter 6 of the HMTM for guidance).

Low	(PG III)	<input type="checkbox"/>
Medium	(PG II)	<input checked="" type="checkbox"/>
High	(PG I)	<input type="checkbox"/>
No Packing Group		<input type="checkbox"/>

3. Material Hazard Level

What hazard does transferring your material pose? What hazard would your material pose to personnel, equipment, and environment should containment be lost during transfer?

(See Chapters 5, 6, and 7 of the HMTM).

Low
Medium
High

4. Transfer Category

What type of transfer is this?

Routine
Nonroutine

If more than one hazardous material is being transferred on the transport vehicle, check compatibility of lading with packaging materials and compatibility during transport of multiple hazardous materials.

5. Package Hazard Assessment

What type of package is your material in?

DOT
DOT-E
TSO-approved DOT-NE
DOT-NE

If your package is DOT-NE, it must be evaluated in accordance with Chapter 5 of the HMTM, and you must acquire approval from the TSO before transferring your material in this package.

6. Transportation System Assessment and Evaluation

Using the information gathered in steps 1 through 5, determine the minimum requirements that your transportation system must have to transfer your material.

Your material transfer has been rated as low moderate high

Therefore, your transportation system must meet the requirements for that level stated in Chapter 5 of the HMTM.

7. Transportation System Documentation

For transfers rated as a moderate or high, the documentation must accompany the transfer and be located in the glove box or the driver's side door pocket. See the applicable Subject Area for specific transportation requirements.

8. Packaging and Transfer Details

Identify any specific requirements for this transfer* (e.g., the specific type of package, labeling requirements, hazard communication requirements, transport routes).

* See continuation of section 8

Transportation Safety Officer or SME Approval

Date

BNL On-site Transfer/SAM Form

New York State Dept. of Environmental Conservation (NYSDEC) - Regulated Medical Waste (RMW) may be transferred within the BNL Complex under the following conditions:

1. DOE vehicle is utilized,
2. Medical Waste Control Form is carried along with the RMW [*Note: RMW with short-lived isotopes that have decayed >10 half lives must have the above form signed by an FSR*]
3. Waste tag is affixed to the RMW container w/ corresponding tracking no.,
4. Arrangements are made with Medical Dept. personnel for drop-off,
5. Sharps must be contained within a rigid/puncture and leak resistant sharps container(s) (no more than $\frac{3}{4}$ full) and placed inside a Biohazard Bag (BB). [*Note: No more than 1 large sharps box/BB*],
6. Ice Cream Containers (ICC) must have a BB liner and be securely covered with an ICC top cover using suitable tape and be contained inside another BB,
7. U.S. DOT-approved cardboard box(es) with a BB liner, a covered ICC lined with a BB and then placed inside an outer BB, or a single BB may be utilized for non-sharp transfers (e.g., contaminated gloves, wipes, pads, etc.),
8. Vials/test tubes/large pipettes placed inside leak-proof, secondary plastic container(s) with secure tops (e.g., sharps box, 5-gallon pail) may be utilized for liquid RMW exceeding 20 mls.
9. Package(s) must be secured in vehicle
10. Take most direct route