

	Brink's - US		OS&H Policy	
	Subject: Contaminated / Mutilated Coin / Currency	Policy Number	Date Created: 02/04/04	Date: Revised:

TRANSPORTATION OF CONTAMINATED OR MUTILATED CURRENCY OR COIN

Protocol for Transportation of Currency Designated as “Contaminated” or “Mutilated” by the Federal Reserve System.

1.0 Introduction

Periodically currency becomes damaged or contaminated with various substances to the point that it must be removed from circulation and destroyed. The Federal Reserve Bank Districts (FRB or FED) have established procedures for identification, packaging and labeling of unfit currency and the conditions for notification, documentation and receipt of these packages. Previously Brink's position was to refrain from handling this class of package out of concern from DOT Hazmat regulations. The Safety Department has requested an interpretation from the DOT and the Federal Reserve on this issue that clarifies our responsibilities in this matter. This document now establishes the procedures and protocols by which Brink's personnel may or may not provide CIT service of these items.

2.0 Scope


Brink's U.S. will provide transportation services of contaminated or mutilated currency according to the procedures outlined in this document.

NOTE: Brinks does not perform count or verification services of known contaminated or mutilated currency or coin. Any contaminated or mutilated currency encountered during normal servicing and processing activities must be handled to minimize exposure in accordance with universal precautions, packaged according to the enclosed guidelines and submitted to the responsible deposit institution for processing according to FED guidelines. Therefore contaminated currency or coin cannot have Brink's as a pass through point or destination.

3.0 Procedures

3.1 Notification and Documentation

The depositor or retail customer should supply enough information to allow Brink's to handle transportation of sealed packages containing contaminated currency safely. FED procedures require that the depositor of contaminated or mutilated currency provide as much information as possible concerning the amount of currency, nature of the contamination and persons involved with current contact information.

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3.1.1 Deposit Institutions

The FED will only accept contaminated currency from deposit institutions and has established pre-shipment notification procedures for verbal and in some cases written notification before permitting shipment and receipt of contaminated / mutilated currency and coin. Shipments that have not been properly cleared according to notification procedures may be refused at the FED docks. Deposit institutions must make prior arrangements and schedule pickup of contaminated or mutilated currency and coin with Brink's.

3.1.2 Retail Customers

Retail customers must make prior arrangements and schedule pickup of contaminated currency. Brink's Crews that encounter unscheduled contaminated currency pickups or suspect that a shipment from retail customers or individuals may be contaminated must instruct the customer to contact branch management and their bank or deposit institution for instructions on packaging and to schedule future pickup. Crews should also notify retail customers of Brink's transit requirements for packaging and labeling. (see appendix A: Customer Communication Concerning Contaminated Currency and Coin)

3.1.3 Customer Communication

"Customer Communication Concerning Contaminated Currency and Coin" in Appendix A is provided as standard communication to all customers. Copies of this document should be issued to all crews and available at the branch for distribution to customers as required.

3.2 Packaging Requirements

All contaminated currency must be double bagged in sealed, tamper resistant, clear plastic bags. Bags and seals must be numbered, air-tight and currency must be visible. Individual Federal Reserve Districts may also have additional packaging requirements that the deposit institutions are required to follow.

3.3 Labeling

All packages of contaminated or mutilated currency that are submitted for transportation to Brink's must be clearly labeled. The self-adhesive label must contain the word CONTAMINATED or MUTILATED in block letters, list the identity of the agent of contamination if known and the amount said to contain. Labels can be preprinted and agent and value amounts handwritten. In the case of blood or bodily fluid a biohazard sticker should also be applied.

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A template is included as an attachment to this policy that can be used in conjunction with standard Avery labels to create labels for Contaminated Currency and Bio-Hazard symbols as needed. The template is set up to use Avery labels size 3 1/3" X 4",

- Label number 05264 for laser printers and
- Label number 08164 for ink jet printers.



3.4 Transit

Packages of mutilated and contaminated currency must be segregated from other deposits and may require point-to-point transfer and pricing. Double-bagged, labeled packages will be placed in plastic totes to provide additional protection during transit.

3.5 Federal District Requirements

The Federal Reserve Branch in each district may have additional requirements. List specific Fed District requirements here:

4.0 Training and Authorization

4.1 Training Schedule

- 4.1.1 Initial training – A sufficient number of crews must be designated, trained and authorized before providing this service to our customers.
- 4.1.2 Refresher Training - Crews must be retrained in these procedures in the following situations:
- Bi-annual refresher training
 - Changes or new situations, materials or hazards are encountered.
 - Inspections or events indicate procedures are not being followed.

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4.2 Training Content

Training must consist of :

- 4.2.1 Bloodborne Pathogens Training,
- 4.2.2 Universal Precautions,
- 4.2.3 Brink's Packaging and Labeling requirements and the definitions contained in this procedure
- 4.2.4 Brink's Emergency Response protocols.

4.3 Training Documentation

Training records (BRTL 01/02) must be maintained to verify initial and bi-annual training has been conducted.

5.0 Equipment

The customers are responsible for packaging and labeling their packages according to Federal Reserve Bank Guidelines and Brink's protocols. Additional basic equipment required for safe transport of contaminated currency is as follows:

- 5.1 **Universal Precautions Kit** – Universal precautions PPE kit will be issued to each crewmember for the run. The kit must contain a minimum of impervious nitrile gloves, eye protection, and plastic apron. The kit is used if a bag is damaged or leaks in transit. Kits may be purchased from standard safety supply vendors.
- 5.2 **Plastic Bags** - Trigon or other similar heavy duty, sealable clear plastic bags. Bags damaged in transit should have an additional outer bag placed around the package. (DO NOT Repackage.)
- 5.3 **Additional Labels** - Self Adhesive Labels (see 3.3)
- 5.4 **Secondary Container** – a secondary plastic tote to store the double-bagged packages in transit.

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6.0 Definitions

6.1 NON-MACHINABLE Currency (Formerly and commonly referred to as MUTILATED)

“Non-machinable currency” is defined as currency that cannot be processed on high-speed note-sorting equipment due to damage to the note. Deposits of non-machinable currency must be sent as separate deposits and be clearly marked as “NON-MACHINABLE.” The currency must not pose a health or a safety risk, and the denomination of the bill must be readily identifiable.

6.2 MUTILATED Currency (Current FRB Definition)

“Mutilated currency” is defined as lawfully held U.S. currency that is not recognizable by denomination and/or not easily verified due to deterioration. For example, currency can be rendered “MUTILATED” by being buried, burned, or decomposed due to aging. Customers should be directed to contact the U.S. Treasury for special packaging and shipping instructions at the following address:

Department of the Treasury
Bureau of Engraving and Printing
Office of Currency Standards, Room 344
Post Office Box 37048
Washington, DC 20013-7048

6.3 CONTAMINATED Currency

“Contaminated currency” is lawfully held U.S. currency that may pose a health or safety hazard due to known or suspected contact with a biological, chemical, or radioactive substance. Brink’s further classifies contamination threats into the following levels.

Brinks Level 1:

Biological contaminates – Human or animal blood or body fluid, sewage, mold, mildew, floodwater.

Chemical contaminates – Dye pack, motor oil, and other chemicals that are not immediately dangerous to life and health (IDLH).


NOTE: Brink’s Cash Logistics does not process known Contaminated or Mutilated currency.

Brinks Level 2:

Level 2 contaminate is defined as any radioactive contamination, or a biological or chemical contamination that is immediately dangerous to life and health (IDLH) or that is suspected to be part of a terrorist threat.

Note: Brink’s personnel will refuse packages in Brink’s Level 2 category. Customers should be referred to appropriate Federal, State or Local HAZMAT Response teams and the cash services officer at the Local Federal Reserve District for further instruction.

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APPENDIX - A

1. Request for Interpretation
2. DOT Response Letter
3. Customer Communication Concerning Contaminated Currency and Coin
4. Avery Label template information
5. Label Template

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Request for Interpretation



Brink's U.S.
A Division of Brink's, Incorporated
555 Dividend Drive
Suite 100
Coppell, Texas 75019-4959
Tel: (469) 549-6033
Fax: (469) 549-6232
A Subsidiary of The Pittston Company

June 2, 2003

Research and Special Programs Administration
Office of Hazardous Materials Standards (DHM-10)
US Department of Transportation
400 Seventh Street SW
Washington, DC 20590-0001

**Subject: Interpretation on Contaminated Currency and Infectious Substance Classification
Currency Contaminated with Human Blood or Body Fluids**

Dear Sir or Madam:

On occasion banks receive currency that has been mutilated or contaminated by a variety of substances. The most common contaminants are blood, body fluids, sewage, and dye pack chemical, while less frequent items are water, mold, chemicals or other substances that make the currency unsuitable for circulation. The bank personnel usually remove the "contaminated currency" and double bag it in heavy-duty, tamper-resistant, clear plastic security bags. The bags in turn are labeled for shipment and transported to the Federal Reserve for destruction.

We believe these shipments do not meet the definition of infectious substance (class 6.2) under 49 CFR 173.134.

We base our conclusion on the following facts:

- We have no reason to believe or suspect that the blood or bodily fluids or other contaminants would cause any severe, disabling or fatal disease;
- We have no reason to suspect that any of the blood or contaminants contained any agent listed in 42 CFR 72.3
- We are not shipping the contaminated currency for diagnostic purposes;
- The blood/fluids were not prepared or manufactured in accordance with 9 CFR or 21 CFR regarding biologic or drug products; and
- The contaminated currency appears to meet conditions consistent with other exceptions of Division 6.2 materials granted per 173.134 (b).
- The potential exposure is minimal due to the airtight, tamper resistant sealed double-bag packaging.

Furthermore, We believe that it is in the interest of public safety for "Contaminated Currency" to be shipped under armed escort to prevent theft and reintroduction into circulation.

Please let us know if you concur with our assessment of this situation.

Sincerely,

Stan Turbyfill
Director of Safety

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DOT Response



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

JUN 24 2003

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

Mr. Stan Turbyfill
Director of Safety
Brink's U.S.
555 Dividend Drive, Suite 100
Coppell, Texas 75019-4959



Ref. No: 03-0139

Dear Mr. Turbyfill:

This is in response to your June 2, 2003 letter asking whether currency collected from banks that has been contaminated by a variety of substances (e.g., blood, body fluids, sewage, dye pack chemical, etc.) would be regulated as an infectious substance under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state that your company has no reason to believe this currency, which is transported to the Federal Reserve for destruction, meet the definition in § 173.134 for an infectious substance.

As you state, the HMR define an "infectious substance" in § 173.134 as a material known to contain or suspected of containing a pathogen that has the potential to cause disease in humans or animals. Therefore, based on the information you provided, the soiled currency do not meet the definition of an infectious substance in § 173.134 because there is no reason to know or strongly suspect the currency contain an infectious substance.

I hope this satisfies your request.

Sincerely,

Hattie L. Mitchell, Chief
Regulatory Review and Reinvention
Office of Hazardous Materials Standards

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Customer Communication Concerning Contaminated Currency and Coin

In the interest of safety of Brinks' and it's customers' employees and to be in full compliance with Federal Reserve requirements, Brinks has developed a procedure for the safe transportation and handling of sealed and labeled packages of currency designated as or suspected as contaminated and/or mutilated.

Because the risks of each situation are unique and relatively infrequent if not rare, Brink's is requiring all such shipments to be prearranged and approved. Please contact your local bank or deposit institution and your local Brinks management for packaging and labeling instructions and to schedule shipment pickup. When this is done Brinks local management in conjunction with Brinks Safety Department will give current instruction for packaging and identification of the shipment as well as refresh our truck employee's training and protective equipment.

We are advising all Brinks truck employees to refuse any shipment of contaminated or suspected contaminated currency for which they did not have prearranged instructions.

COMMON DEFINITIONS

NON-MACHINABLE Currency (Formerly and commonly referred to as MUTILATED)

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MUTILATED Currency (Current FRB Definition)

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LABEL INFORMATION

Avery® White Mailing Labels

Smudge-Free printing guaranteed.

- Bright white labels provide sharp print quality for ink jet printers.

Avery Code	Stock No.	Description/Size	Labels/Sheet	Labels/UOM
Ink Jet				
08167	8167	Mailing, 1/2" x 1 3/4"	80	2000
08160	8160	Mailing, 1" x 2 5/8"	30	750
08810	8810	Mailing, 1" x 2 5/8"	30	1200
08460	8460	Mailing, 1" x 2 5/8"	30	3000
08161	8161	Mailing, 1" x 4"	20	500
08461	8461	Mailing, 1" x 4"	20	2000
08162	8162	Mailing, 1 1/2" x 4"	14	350
08462	8462	Mailing, 1 1/2" x 4"	14	1400
08163	8163	Mailing, 2" x 4"	10	250
08463	8463	Mailing, 2" x 4"	10	1000
08164	8164	Mailing, 3 1/2" x 4"	6	150
08464	8464	Mailing, 3 1/2" x 4"	6	600
08165	8165	Full Sheet, 8 1/2" x 11"	1	25
08465	8465	Full Sheet, 8 1/2" x 11"	1	100



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Avery Code	Stock No.	Description/Size	Labels/Sheet	Labels/UOM
05264	5264	Mailing, 3 1/2" x 4"	6	150
05164	5164	Mailing, 3 1/2" x 4"	6	600
05168	5168	Mailing, 3 1/2" x 5"	4	400
05265	5265	Full Sheet, 8 1/2" x 11"	1	25
05165	5165	Full Sheet, 8 1/2" x 11"	1	100

**CONTAMINATED
CURRENCY**

Agent: _____

Said to Contain: \$ _____

**MUTILATED
CURRENCY**

Agent: _____

Said to Contain: \$ _____

**CONTAMINATED
CURRENCY**

Agent: _____

Said to Contain: \$ _____

**MUTILATED
CURRENCY**

Agent: _____

Said to Contain: \$ _____

**CONTAMINATED
CURRENCY**

Agent: _____

Said to Contain: \$ _____

**MUTILATED
CURRENCY**

Agent: _____

Said to Contain: \$ _____



BIOHAZARD



BIOHAZARD



BIOHAZARD



BIOHAZARD



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BIOHAZARD