



# THE HAZMAT NEWS NETWORK



Regulatory Resources, Inc. 240 Joshua Road Kennewick, WA 99338

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**HAPPY APRIL EVERYONE!** Welcome to the April 07 issue of The Hazmat News Network. This newsletter is a free service to help you in your regulatory compliance activities. We hope you find this free information useful. Pass it on to others and let them know they too can receive this valuable service by email for free.

**DOCKET ACTION IS STILL SLOW** since our last newsletter. The one new one is summarized below. Please note that we do not address Special Permit (formerly Exemptions) actions.

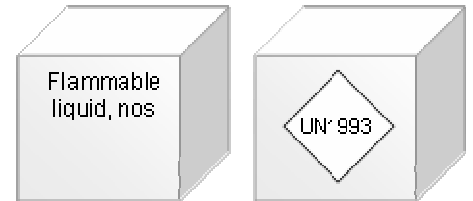
**Mar 26:** The DOT published an advisory to inform the traveling public and airline employees about the importance of properly packing and handling batteries and battery-powered devices when they are carried aboard aircraft. Thousands of batteries and battery-powered devices are safely carried aboard passenger aircraft each day, but several recent incidents involving batteries in checked or carry-on baggage illustrate the risks of overheating and fire that can occur when the regulations are not followed. DOT hazmat regulations require that electrical storage batteries or battery-powered devices carried aboard passenger aircraft be properly packaged or protected to avoid short-circuiting or overheating. In this safety advisory, DOT suggests various practical measures for complying with the regulations and minimizing transportation risks. Recommended practices include keeping batteries installed in electronic devices; packing spare batteries in carry-on baggage; keeping spare batteries in their original retail packaging; separating batteries from other metallic objects such as keys, coins and jewelry by packing individual batteries in a sturdy plastic bag; securely packing battery-powered equipment in a manner to prevent accidental activation; and ensuring batteries are undamaged and purchased from reputable sources.

**WE'RE DOING OPEN TRAINING AGAIN!** It has been a few years since we offered any open-enrollment DOT hazmat workshops. Most all of our work is performed directly for clients at their site location. This year we're offering a full compliment of courses. Our first '07 course begins May 7<sup>th</sup> in Richland, WA. For enrollment information and a course syllabus for each of our course offerings visit our website at [www.regulatoryresources.net](http://www.regulatoryresources.net) (see the next page for links). Remember, these open-enrollment workshops are on a first-come, first-serve basis. Don't delay in getting your registration in. Be sure to make your hotel arrangements early to ensure a room is available.

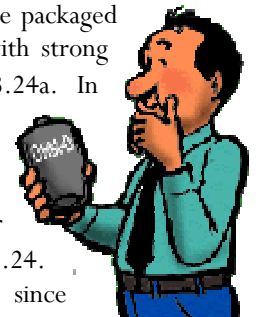


**MAKE SURE TO READ THE REGS CLOSELY!** Packages containing materials that are prepared as "limited quantities" are

allowed relief from some of the hazard communication requirements. Concerning package markings, the offeror has two marking exception options: (1) the identification number (UN or NA) is not required to be displayed on the package if the proper shipping name is marked (§172.301(a)(1)); or (2) the proper shipping name is not required to be displayed on the package if the identification number is in a square-on-point display per §172.315. If the shipper opts to use the square-on-point display, they are also excepted from the requirement to identify the technical names of the hazardous material (§172.301(b)) and are excepted from the RQ markings in §172.324. You see, both of these additional marking requirements are tied directly to the marked proper shipping name on the package – no marked proper shipping name...no requirement. If the offeror opts to place the proper shipping name on the package rather than the ID number display, both the §§ 172.301(b) and 172.324 marking requirements apply.



**WHILE WE'RE ON THE SUBJECT OF** limited quantities, many materials and wastes that are authorized as limited quantities may also meet the definition and criteria to be shipped as consumer commodities, ORM-D. The ORM-D designation is a carry over from days past (pre HM-181 for you old timers) when there were originally five ORM designations. Consumer commodities offer many exceptions from the full hazmat regulations. In fact, §173.156 excepts, under conditions, the ORM-D from all package markings in Part 172 Subpart D and the 66 pound 'package' weight limit restriction, and if not a hazardous substance or hazardous waste, the shipping paper requirements of Part 172 Subpart C as well. Normally, at a minimum, all hazmat must be packaged in a strong outer container (synonymous with strong tight package) that meet §§ 173.24 and 173.24a. In the case of ORM-D under §173.156(b), this requirement is also excepted! In some of DOT's responses to ORM-D questions they have stated that the packaging used for ORM-D under §173.156(b) must meet §173.24. This appears to be a contradiction since §173.156(b)(1) specifically states that strong outer packagings are not required when unitized in cages, carts, boxes or similar overpacks. However, what DOT is referring to is the actual container holding the ORM-D material/waste. The 'inner packaging' is subject to all applicable general packaging requirements in §§ 173.24 and 173.24a. Read the regulations carefully!





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## RRI's 2007 Training Schedule

May 7-9 (*til noon)	Initial DOT <a href="#">Hazardous Materials</a> & <a href="#">Waste</a> Packaging & Transport	Richland, WA
May 9 (at 1pm) -11	<a href="#">Initial DOT Radioactive Materials Packaging &amp; Transport</a>	Richland, WA
June 26-29*	<a href="#">DOT &amp; IATA/ICAO Radioactive Materials Packaging &amp; Transport*</a>	Houston, TX
July 9-13	<a href="#">Adv DOT Radioactive Material Packaging &amp; Transport</a>	Las Vegas, NV
July 23-27	<a href="#">Advanced DOT/RCRA Waste Packaging &amp; Transport</a>	Richland, WA
August 29-30	<a href="#">DOT Explosives Packaging and Transport</a>	Las Vegas, NV
October 29 - Nov 2	<a href="#">Advanced Mixed Waste Packaging &amp; Transport</a>	Richland, WA
December 4-5	<a href="#">IATA/ICAO Dangerous Goods Packaging &amp; Transport</a>	Richland, WA
December 6-7	<a href="#">IATA/ICAO Radioactive Materials Packaging &amp; Transport</a>	Richland, WA

### Training Location Information

Richland, WA 99338  
[Hampton Inn](#)  
 486 Bradley Blvd  
 509-943-4400  
 800-560-7809

Houston, TX 77056\*  
[DGAC](#)  
 1100 H Street, NW  
 202-289-4550  
 800-634-1598

Las Vegas, NV 89109  
[Atrium Suites Hotel Las Vegas](#)  
 4255 S. Paradise Road  
 702-369-4400  
 800-330-7728

\*For course registration and hotel info, contact DGAC and ask about course HMT-601.

### Cost Information and Registration Form

May 7-9 (*til noon)	Richland, WA	\$ 650 each	} Both classes for \$1195 each	<a href="#">Registration Form</a>
May 9-11 (at 1pm)	Richland, WA	\$ 650 each		
<a href="#">June 26-29*</a>	Houston, TX*	\$1145 each (\$995 for DGAC members) – Course Number HMT-601*		
July 9-13	Las Vegas, NV	\$1395 each		<a href="#">Registration Form</a>
July 23-27	Richland, WA	\$1295 each		<a href="#">Registration Form</a>
August 29-30	Las Vegas, NV	\$ 675 each		<a href="#">Registration Form</a>
October 29 - Nov 2	Richland, WA	\$1295 each		<a href="#">Registration Form</a>
December 4-5	Richland, WA	\$ 675 each		<a href="#">Registration Form</a>
December 6-7	Richland, WA	\$ 675 each		<a href="#">Registration Form</a>

For course information, visit [www.regulatoryresources.net](http://www.regulatoryresources.net). Registration forms for each course are hyperlinked in the above text. You can obtain the registration forms on our website. If you have questions, please contact us at [training@regulatoryresources.net](mailto:training@regulatoryresources.net).