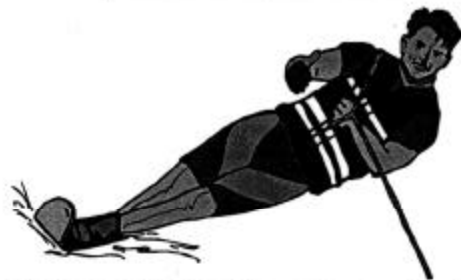




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SUMMER'S HANGING ON!

Can you guess what my favorite summer activity is? Yep, that's right, reading the Federal Register. Skiing is a close second (I

also have a lot of land for sale in the river if you're interested).

HERE'S YOUR AUGUST ISSUE of *The Hazmat News Network*. There is no charge for this service. Feel free to copy *The Hazmat News Network* and pass it along to other professionals.

A NEW TRAINING SCHEDULE IS BEING GENERATED that will identify the courses, locations, and dates of our basic and advanced level DOT hazardous materials and hazardous waste courses. We specialize in targeting the needs of a given audience. We offer advanced level courses that can't be obtained anywhere else. For example, advanced radioactive material transportation by IATA/ICAO or IMO/IMDG; and designation, classification, and identification of wastes and materials. Our courses are intense. We're so sure that you'll consider it the best workshop you've attended that we'll give you your money back if you're not satisfied. Don't just take our word for it - call one of our customers yourself. Give me a call or drop me an email if you're interested in a referral.

AEROSOLS CREATE PRESSURE ON 10/1/96. Are you one of the many who ship your waste aerosol cans in 55 gallon drums? If so, you'd better be ready for October 1, 1996. Remember back on December 20, 1991, DOT published HM-181. This docket changed our hazmat lives forever. As a break to us, DOT granted a 5-year phase-in of the new United Nations packaging requirements. The five years ends October 1, 1996. What this means for aerosols is that after October 1st the maximum gross mass of an aerosol package is 66 pounds. The only way to avoid this is to have packaged the aerosols prior to October 1, 1991. Hmmm, but your Honor...

STRONG-TIGHT PACKAGING IS NOT EXCEPTED PACKAGING according to the new radioactive material regulations (formally HM-169A). Under the newly revised requirements, excepted packagings for radioactive materials must meet the minimum standards in 49 CFR 173.410. This applies to radioactive materials shipped as limited quantities, instruments, articles and others. Strong-tight packaging is not subject to the minimum requirements in § 173.410. However, strong-tight packaging is only authorized for exclusive use domestic shipments of $\leq A_2$ quantities of Low Specific Activity

(LSA) materials and Surface Contaminated Objects (SCO). This is not addressed very well in the regulations (are we surprised?). Two references must be viewed. First, the definition of "Package" in § 173.410. In subparagraph "(1) Excepted package," note that the reference for LSA and SCO materials is not included (i.e., § 173.427). The second reference is § 173.427(b)(3). This is the only location in the radioactive materials requirements (Subpart I) that identifies "strong-tight packaging." A strong-tight packaging is defined as a packaging which is tough, firm and durable (i.e., strong) and is constructed and closed so that its contents cannot pass through (i.e., tight). Visible cracks - flaps that do not quite meet or hand holds - are permissible if they do not affect the structural integrity of the packaging. Remember, all packagings intended for hazardous materials (including radioactive materials) transportation must meet the minimum requirements in § 173.24, § 173.24a, and § 173.24b (as applicable).

ARE YOU TIRED OF TRYING TO CLASSIFY rags and materials that contain absorbed flammable liquids, corrosive liquids, or toxic liquids? Me too. Finally, we have a break. Docket HM-215A introduced three new proper shipping names specific to the problem of absorbed hazardous liquids. These three PSNs are *Solids Containing Flammable Liquids, nos*; *Solids Containing Corrosive Liquids, nos*; and *Solids Containing Toxic Liquids, nos*. The real benefit of these new PSNs is the Special Provision allowance applicable to each name that allows the shipper to use these PSNs without first having to meet the PSNs associated hazard class. For example, if we're not sure the rag containing an absorbed flammable liquid would meet the definition of a DOT hazard class, we can still opt to select the PSN *Solids Containing Flammable Liquids, nos* and class the material as 4.1. You don't get breaks like this every day... use it!

DOT DOCKET ACTIVITY IS ON HOLD FOR THREE WEEKS because the 8th floor Nassif Building is getting a thorough cleaning. The cleaning began on August 12th. Finally, a break for everybody. I know this situation presents an opportunity for many wonderful jokes but let's refrain and not dirty ourselves.

BILL IN THE HOUSE PROPOSES TO EXEMPT DOT HAZMAT REGULATIONS to any vehicle with a gross vehicle weight rating of 10,000 pounds or less. This exemption includes hazardous substances! The only exception to the exemption is for materials subject to placarding before January 1, 1996. Now wait just a minute. This means I can fill a vehicle at a GVWR $\leq 10,000$ pounds with toxic materials, flammables, oxidizers, **FOOD**, and who knows what else and not be subject to any hazmat transportation regulations. Gee, do you think people will take advantage of this? Where's safety? The Bill is H.R. 3153. Call your representative. This Bill is down-right scary!