




WELCOME TO THE JULY 2000 NEWSLETTER!

Regulatory Resources hopes each of you are having a wonderful summer. The goal of our newsletter is to provide you with FREE hazardous materials packaging and transport, and hazardous waste operations information. Although copyright protected, please feel free to copy this newsletter in whole to give to someone who may benefit.

THE DESIGNATION HAS BEEN CHANGED for the IAEA Regulations for the Safe Transport of Radioactive Material. The former designation of ST-1 is now TS-R-1. The supplemental publications ST-2 is now TS-G-1.1 and ST-3 is TS-G-1.2. Ahhh, don't ya love it!

 **A LITTLE BIT MORE ABOUT US.** In our last issue we told a bit about us. Since then, some have asked what type of classes we provide. On the DOT hazardous materials regulations side, we provide training for all levels of employee, from the entry level positions to the 20+ year veteran, including carriers. Our basic courses provide the participant with the process of preparing a hazmat for shipment, including basic classification, identification, packaging and hazard communications. Our advanced level programs delve into the details for material classification and packaging, and advanced hazcom topics. For example, our Advanced DOT Waste Packaging & Transportation Certification Workshop spends two full days on RCRA and DOT classification, followed by one full day on packaging. And remember, advanced topics do not include information already addressed in the basic class(es). Another unique course focuses solely on those who are responsible for the inspection of shipments for compliance. Again, this is an advanced workshop that covers both hazardous materials and hazardous waste, and if requested, radioactive materials. One area we don't teach...the details for classification of explosives. As for RCRA, we have both basic and advanced "operational" workshops. Our primary focus is on containerized waste, including designation, LDR, accumulation and storage, and treatment options. Remember, we'll come to you and provide "site-specific" training. If you find that you don't learn anything new, we'll refund your money less the cost of the materials (give us a call).

DOCKET ACTION FOR JULY. It appears the regulators have taken some vacation. Docket action for this month:

- **July 17th:** The NRC published a NPRM seeking early public input on the major issues associated with revising their regulations concerning the packaging and transportation of radioactive materials. The NRC is proposing to revise their

regs to be compatible with the IAEA TS-R-1 and codify other new regulations as well. Comments are due by 9/30/00.

- **July 18th:** EPA published a NPRM seeking public comment on the human health and ecological risk data and information relating to an exemption from hazardous waste management as discussed in the HWIR docket from November 19, 1999. Comments are due by 10/16/00.

- **July 20th:** RSPA published a notice of public meeting to seek information on improving safety, reducing costs and increasing customer service through RSPA's management of the national hazmat transportation safety program. The meeting is scheduled for 9/13/00 in Cleveland, OH.

AS USED or AS TESTED. For **specification packaging**, the terms single packagings, composite packagings and combination packagings apply to the package configuration *as tested*. A single tested specification drum, by tested configuration, is always a "single packaging." The package retains the single packaging definition even when configured for use by the shipper with inner receptacles. To define this packaging as a combination packaging requires the configured package assembly (with inner packagings) be certified, by testing, in the "as tested" configuration. **Excepted packages** are, by title, excepted from specification requirements (e.g., performance testing). When combination packaging is the required configuration for an excepted packaging, the term "combination packaging" refers to the package *as used*. This is a very important distinction in the packaging regulations since the term "combination packaging" is used for both excepted and specification packagings. **Combination tested, specification packagings** are more limited in use than single tested specification packagings. Because single tested packagings are tested without the benefit of an inner receptacle(s) the addition of an inner packaging is authorized as long as the material contained meets the limits as indicated in the packaging identification code and the inner packaging configuration will not reduce the integrity of the package. Single packagings tested to contain solids are also allowed inner packagings. Take note, however, since the packaging was only tested for solids, addition of liquids in this packaging is forbidden when used as a specification packaging.

