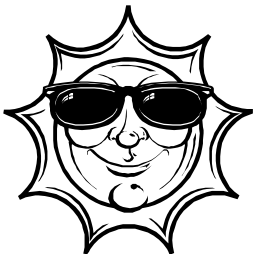


*The Hazmat News Network* provides information on regulatory actions, docket summaries, events, and services that may assist in establishing or maintaining regulatory compliance. If you do not want to be a part of *The Hazmat News Network*, call or send a facsimile to us and we will remove your name from this service. *Regulatory Resources, Inc.* makes no warranties, direct or implied, concerning the accuracy of the information addressed.

**From: Wade A. Winters, CET, CHMM (509) 586-6438, Fax: (509) 582-1187, email: rri@televar.com July 1997**



**SUMMER DAYS ARE HERE AGAIN!** It's finally gotten hot up here in the great northwest. Summer has been slow coming, but at last, we're cookin'. I hope *The Hazmat News Network* is helping you out in your compliance responsibilities. If you know of someone who may benefit from the publication, pass it on to

them or have them call/fax/email me so I can add them to distribution. Have a safe, fantastic summer!

**DOCKET ACTIVITY SLOWED THIS MONTH...**thank goodness. Here are the big hitters for the hazmat transportation arena.

- July 2<sup>nd</sup>: NRC published a Notice of Availability of a draft report entitled, "Categorizing and Transporting Low Specific Activity Materials and Surface Contaminated Objects." The draft report is for review and comment. The number of the report is NUREG-1608 and available for free (while supplies last) by requesting, in writing, to Distribution Services, U.S. Nuclear Regulatory Commission, Washington, DC, 20555-0001. You can also get this information and much more by simply attending one of our continuing level radioactive material shipping workshops. Call us for details.
- July 11<sup>th</sup>, HM-224A: RSPA published a Notice of Public Meeting to announce RSPA is meeting with Boeing Company and other interested parties to discuss requirements concerning the transportation of chemical oxygen generators, including recent requirements from the final rules of June 5<sup>th</sup> and 27<sup>th</sup>. The meeting is for July 23<sup>rd</sup>. For more info, call 206-662-9707.
- July 14<sup>th</sup>, Notice 97-6: RSPA issued a Safety Advisory Notice for owners and users of DOT IM-101 and IM-102 portable tanks with filling or discharge connections below the normal liquid level. The notice states that these type of IM tanks can **only** be used for hazardous material shipping if they have internal discharge valves and shear sections.

**SALVAGE DRUMS NIGHTMARES** can occur very quickly in the operational environment. Many people in the hazmat packaging and transportation business misuse the salvage drum exception in 49 CFR 173.3(c). The scope of the salvage drum exception is difficult to explain. In the operational world, the salvage drum is often referred to as an overpack (however, with regard to DOT's definitions, a salvage drum is NOT an overpack).



If a drum is discovered to be bad or leaking, the worker is to "overpack" the drum using a salvage drum. This is great, and must be done to meet specific requirements under OSHA and EPA. Now the sticky part. In order for the salvage drum configuration just created to be authorized for shipment, the salvaging operation must have occurred "in transportation" or the salvage drum is the authorized packaging, as configured, for that material/waste. The first allowance is "in transportation". This encompasses the (1) loading of the package onto the vehicle, (2) transportation of the package and any subsequent temporary storage while in transportation, and (3) unloading of the package at the consigned destination. If the situation occurs requiring a salvage drum at any other time, it is NOT authorized for further transportation unless the salvage drum itself is the authorized packaging for the material. This includes loading docks prior to vehicle loading (i.e., staging) and all storage that is not part of the "in transportation" process. Now, as for the salvage drum being the authorized packaging...very unlikely. Remember, a bad package inside of a salvage drum is defined as a "combination packaging". Are your salvage drums tested to the configuration you've just created? Hmm. However, there is an alternative to this and many other packaging selection and operations issues discussed in our Intermediate and Advanced Training Workshops. Speaking of which...

### FINALLY, SOMEONE IS THROWING YOU A LIFELINE!

Many new training programs are available for the DOT hazardous materials and hazardous waste community. Some of these courses go way beyond any hazmat or waste transportation course currently available in today's market. The hazmat professionals who take the U.S. DOE hazardous materials transportation courses and workshops continue to come back when retraining is due. They've told us it's because we teach to a depth far greater than anyone else, include the very latest regulatory changes, and teach it from an operational perspective considering safety and economics all the while ensuring full regulatory compliance. We're not amateurs; our instructors have anywhere from 15 to 30 years experience...each! And best of all to you is the cost for this top-of-the-line, professional training. The U.S. DOE's intermediate courses and workshop fees are \$75 for private and commercial companies, \$50 for non-DOE federal employees or government contractors, and no charge for DOE federal employees. Oh, and remember, this is the only DOT hazmat program that carries the official seals of the U.S. DOE and U.S. DOT on the materials and certificates. Sign up now for the October 6-10 intermediate level hazmat transportation workshop in Las Vegas, NV.

