



IT'S FREE...NO STRINGS ATTACHED! Welcome to the March 02 issue of our newsletter. This free publication is provided to assist in your DOT hazmat and RCRA hazwaste compliance needs. Although copyrighted, please feel free to forward this in full to others you think will benefit. And for you fax copy receivers, you should think about switching over to our email distribution. Email provides a much better copy.

YOU ASKED FOR TRAINING SO WE HAVE IT! Say, isn't it time you attended a course that will challenge even the veteran professional. RRI is pleased to announce we're conducting our Advanced Waste Packaging & Transportation Workshop (Course 402) on May 6-10 and our Advanced Radioactive Materials Packaging & Transportation Workshop (Course 403) on June 3-6. Both the courses will be conducted



in Livermore, California (just east of Oakland) at the Lawrence Livermore National Laboratory. These courses are designed for those who require an advanced level of understanding in the application of the regulations to operations. The Advanced Waste Packaging &

Transportation Workshop integrates the RCRA hazardous waste regulations with the DOT HMRs for a complete RCRA designation/DOT classification analysis. We then thoroughly examine the many packaging options, exceptions and allowances for wastes. Finally we bring together the transport requirements for a given DOT regulated waste (RCRA, PCB, NESHAP, etc.). The Advanced Radioactive Materials Packaging & Transportation Workshop explains the why's as well as the how's in the complex Class 7 packaging and transport requirements. We discuss how the list of nuclides is generated and the specific requirements for activity determinations. Both LSA Materials and SCO are examined in light of the DOT and NRC guidance policy. Definitions and activity levels are combined to determine selection for optimal packaging. Transport configuration are reviewed based on a variety of needs: LSA Materials/SCO mixed bulk packages; overpacks; and many more. For specific topics of discussion and course costs please download the course information by visiting <http://www.regulatoryresources.net/newslinks.htm> (Mar 02 newsletter). Our registration form is also located at http://www.regulatoryresources.net/documents/general/gen_eric_form.pdf. If you have any trouble accessing the above links you can get the information from our home page at

www.regulatoryresources.net. Please contact us if you have any questions concerning the courses, hotel information, payment options, etc. I look forward to seeing you there!

MARCH DOCKET ACTIVITY increased a bit since last month. Here's what's happening.

- **Feb 26th:** RSPA published an ANPRM, HM-228, "Revision of Requirements for Carriage by Aircraft." RSPA is considering changes that would modify or clarify req't so promote safety, promote compliance and enforcement, eliminate unnecessary regulations, convert certain DOT-E's into regulations, finalize petitions for rulemaking, facilitate international commerce and make the regs easier to understand (say what?). Comment are due by 5/31/02.

- **Mar 1st:** The FMCSA published a final rule amending the FMCSRs to revise the requirements for filing the Motor Carrier Identification Report.

- **Mar 5th:** RSPA published the final rule, HM-145M, updating the list of hazardous substances based on changes to the CERCLA hazardous substance list. The amendment is effective 10/1/02 but compliance can start today.

- **Mar 6th:** RSPA published Safety Advisory Notice 02-2 to notify us that they are investigating the unauthorized marking of high-pressure cylinders by Fire Safety Products, Inc. in Christiansburg, VA and Princeton, WV.

- **Mar 13th:** EPA published a final rule responding to two court vacatur of regulations under RCRA, first by deleting regulatory language that classified mineral processing characteristic sludges and by-products being reclaimed as solid waste under RCRA's hazwaste regs, and secondly, by codifying the decision that the TCLP may not be used for determining whether manufactured gas plant waste is hazardous under RCRA. The rule was effective on 3/13/02.

WHADDAYAMEAN F003 ISN'T F003 ANYMORE? Oh, you just have to love regulations! EPA published a final rule on May 16, 2001 that changed the F003 criteria by rewriting 40 CFR 261.3(a)(2)(iii) and relocating it to 261.3(g). Prior to the rewrite, if a solvent waste met the F003 listing description the waste was coded F003 regardless if the waste was ignitable or not. The self-implementing exception applied to F003 waste mixed with solid waste, the result of which the waste was no longer ignitable. Now, if a solvent meets the F003 listing description and the waste is not ignitable at the point of generation, the waste is considered to never have been hazardous and is not subject to the land disposal requirements in 40 CFR 268. If you want more about this and its tie to DOT come to our advanced waste class! Ciao