



SPRING IS ALMOST HERE.

Welcome to *THE HAZMAT NEWS NETWORK*. This free newsletter is devoted to providing you hazardous materials and waste packaging and transportation regulatory news. There's no catch. Regulatory Resources hopes you'll find the information of benefit.

HERE'S THE DOT DOCKET ACTIVITY OF LATE...

- **Feb 24th:** RSPA publishes a notice of meeting to discuss proposals contained in a NPRM (10/30/98, HM-220) to revise the cylinder requirements of the DOT hazmat regs. The meetings are April 13, 14, and 15 at the DOT Nassif Building in Washington, DC.
- **Mar 1st:** The EPA published an advanced NPRM describing several options EPA is considering to make their regulations more flexible for generators of mixed low-level radioactive waste who are storing these wastes the both the EPA and NRC oversight. Comments to this docket are due by 4/15/99.
- **Mar 1st:** RSPA published a final rule extending from March 1st to July 1st the period for continued manufacturing of MC 331 cargo tanks without certification and demonstrated performance of the emergency discharge control system.
- **Mar 5th:** RSPA published the final rule for HM-215C. See the article in this issue for docket highlights.
- **Mar 9th:** The FHWA published a NPRM to amend the regulations governing the Motor Carrier Safety Assistance Program (MCSAP) to broaden the scope of the MCSAP beyond enforcement activities and programs by requiring participating States to assume greater responsibility for improving motor carrier safety. Comments are due by 5/10.
- **Mar 12th:** The FHWA published a notice announcing the extension of the period for public comment on draft Truck Size and Weight study. Comments are extended to 4/15/99.

ADVANCED HAZARDOUS WASTE PACKAGING & TRANSPORTATION TRAINING WORKSHOP

is waiting for you in Las Vegas, Nevada. Regulatory Resources, Inc. is pleased to announce we are conducting the much asked for DOT Advanced Hazardous Waste Packaging & Transportation Workshop on May 3-7, 1999, at Las Vegas, Nevada. We have limited the workshop to 25 participants. Don't delay in registering while we still have some seats open. Also, please take special note that this is an "ADVANCED" training program. Therefore, RRI assumes that all participants already possess certification from a basic DOT class and are able to prepare for shipment a standard hazardous material (e.g., acetone). Hey recertification folks...If you've already

taken an advanced course and are in need of recertifying, this is the course you'll want to take. We'll be covering: (1) RCRA and TSCA definitions and designation criteria; (2) hazardous substance determinations; (3) detailed DOT classifications; (4) DOT PSN identification process; (5) packaging options; (6) DOT, RCRA, and TSCA hazard communications; (7) vehicle configuration. Be prepared to delve into multi-agency requirements and interfacing, complex classifications, and the complete picture of DOT packaging options. To give you an idea of the intensity, we'll spend the first 3 days covering classification and identification of hazardous waste incorporating TSCA, RCRA, CERCLA, and DOT. You will leave with a hazardous waste packaging and transportation process that claims victory over multi-agency complexities. And



for even more, we'll cover the new final rule DOT just published, HM-215C. How sure am I that you'll learn something from this workshop: so sure that I'll refund your money if you're not satisfied! Give me a call, fax or email to obtain course information and a registration form. Remember, don't delay in registering. I anticipate the class will fill rapidly. I look forward to seeing you in Las Vegas!

HM-215C, HARMONIZATION WITH UN RECOMMENDATIONS

It's here. This final rule combines the HM-215C proposal and the HM-217 proposal (Labeling Requirements for Poisonous Materials) into one final rule. Here are the major hitters: (1) addition of new approval provision to allow the use of recycled plastics material for manufacturing plastic drums and jerricans; (2) addition of the symbol "G" in Column 1 of the HMT to identify PSNs requiring technical name identity; (3) amendments to the HMT, Special Provisions, and Marine Pollutants List; (4) amendments to the PSNs requiring technical name identity; (5) incorporation of provisions authorizing reconditioning of packagings other than metal drums; (6) addition of reciprocity provision for Canadian cylinders marked "CTC"; (7) amendments to IBC repairs, qualification and maintenance requirements; (8) amendment of continuing requalification requirements for PTs and IBCs which are intended for a single material; (9) additional requirements for limited quantity packages (stretch-wrap trays) containing fragile packagings;



(10) incorporation of an exception for certain shock absorbers, struts, gas springs and shocks, and other auto energy absorbing articles; and (11) elimination of the "Keep Away From Food" label and placard for 6.1, PG III materials. Now, 6.1, PG III materials require the use of the "Poison" label/placard allowing

"PG III" as optional text in place of "Poison", or for labels, "PG III" marked next to the Poison label. Effective date: 10/1/99. Mandatory date: 10/1/00, except for the elimination of the KAFF label and placard which is mandatory 10/01/03. Oh, intermixing of old and new is allowed...argggggg!

Don't forget to view the second attached file.