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From: Wade A. Winters, CET, CHMM (509) 628-1020, Fax: (509) 628-0972, email: rri@televar.com November 1997



WOW... this month marks the 2nd full year for *The Hazmat News Network*. So far we have been able to bring this monthly publication to your office

absolutely free. It is our goal to continue to provide this service in the 3rd year as well.

WELCOME NEW SUBSCRIBERS to *The Hazmat News Network*. As mentioned above, it's a free service that provides notice about new and pending DOT hazmat transportation regulations and discusses various packaging and transportation topics. Please pass this around to others who may benefit.

THE COURSES ARE FILLING FAST. The December 1-5 basic hazmat workshop in Las Vegas, Nevada, is full. There may still be room in the January 12-16, 1998 offering in Las Vegas as well. The cost for the 5-day workshop: a mere \$350. This includes all reference and course materials (including 49 CFR). The first 3 days cover hazardous materials and wastes; the final 2 days is radioactive materials. Only attend what you need to attend – 3 days or the last 2 days...or all 5 days. Hey, you can't beat the price. I checked the cost for airfare and found rates as low as \$150 round trip. Instruction will be provided by someone with over 20 years in the hazmat business (maybe even me!). And, course certificates for successful completion display the official seals of the US DOT and US DOE. How's that for audit proof training! Call Kelli at 301-309-8442 for scheduling.

THE LABPACK EXCEPTION FOR WASTE is a great way to package wastes for disposal. The regulations for this appear in § 173.12(b). Here's some "extra" information to help you out.

- Both hazardous waste (i.e., RCRA hazardous wastes) and other waste (non-regulated or state regulated) may be packaged together in the same labpack as long as they are chemically compatible.
- The limit of one hazard class of DOT regulated waste per labpack applies only the primary hazard of the waste; subsidiary hazards do not apply. For example, a Class 3 may be labpacked with a Class 3, subsidiary 6.1 as long as both are chemically compatible.
- Liquids are allowed to be labpacked with solids. When selecting the proper shipping name consider the amount of each physical state present. The most prevalent (solids or liquids) is the basis for the shipping name.
- Combustible liquids may be packaged in the same labpack with flammable liquids. Cool.

- Organics and inorganics with the same primary hazard class can be labpacked together as long as all the wastes are chemically compatible. When this occurs, the proper shipping name corresponds to the waste making up the greatest amount in the labpack. For example, if 80% of the waste is inorganic and 20% is organic; the proper shipping name, as applicable, should reflect "inorganic."

And remember, the packaging selected is only required to meet PG III performance tests and can be a liquid or solids tested packaging.

CONSUMER COMMODITIES, ORM-D, keep getting clarified. The term "consumer commodity" refers to an intended use for a given material. It is not limited to actual retail sale to consumers for household use. Rather, Consumer Commodity ORM-D applies to industry as well...including wastes. There are many benefits to ship as Consumer Commodity.

- Reclassification to the ORM-D hazard class.
- Exceptions from specification packaging, even including exceptions from a strong-tight package in some situations!
- No hazard communications on the package except "ORM-D" ...and this is even excepted in some situations. Remember, hazardous wastes always required EPA markings.
- No shipping papers unless the ORM-D is a hazardous waste, hazardous substance, marine pollutant, or shipped by air.
- No placarding required.
- No emergency response information and emergency telephone number required.
- No separation or segregation

Let's look at the benefit for a waste shipment of flammable aerosols. Fully regulated, the outer package is limited to 30 kg gross, full hazcom markings – including a unique marking for the limited quantity identification, included in placarding determinations, and allowed one commodity per packaging unless shipped as a mixed content packaging. Now if reclassified to waste ORM-D and shipped to a single disposal facility, we're excepted from specification and strong-tight packaging as long as the aerosols are unitized (and will not expel any contents), no gross mass weight limit per package, no hazcom markings required (except for RCRA requirements), no placarding considerations, and no separation and segregation requirements. Furthermore, I can have different ORM-Ds present without having to consider a mixed content package since the only hazard class present is ORM-D (ensuring complete compatibility).

DOCKET ACTIVITY IS REALLY SLOW which is great for a change. We'll check again next month.