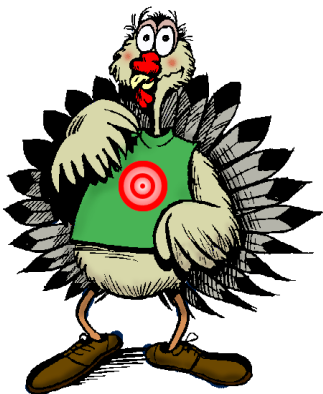




## HAPPY THANKSGIVING



**WELCOME** to *THE HAZMAT NEWS NETWORK*. This newsletter is a **free** service provided by REGULATORY RESOURCES, INC. to help you in the DOT (and some EPA) compliance arena. Please forward this to others that can benefit from the information provided. Thank you.

### THANK YOU FOR YOUR EMAIL ADDRESS.

A lot of you have changed over from fax to email distribution. Thank you. This helps me keep the cost down. For those still receiving this by fax and have an email address, please send it to me at [rri@televar.com](mailto:rri@televar.com). I believe you'll be glad you did.

### WE'RE GEARING UP FOR CY-2000 TRAINING

workshops. I hope to offer a few more this year. Most of the time I work with a company to be the host site. A host site supplies the training facility and visual aid equipment (overhead projector, etc.). In return, we offer the host site a free seat and lower the tuition for their other company attendees. If you're interested, please give me a call. You can have the workshop(s) you want for a fraction of offsite costs. Remember, we also provide custom, site-specific training targeted to your daily operations. Give us a call today to set up your regulatory required training.

### RECENT DOCKET ACTION IS A BIT SLOWER...

- Oct 27<sup>th</sup>: The NRC published a final rule requesting comment concerning the emergency final rule issued 2/10/97. The rule concerns the potential criticality configuration of fissile excepted beryllium oxide-enriched uranium mixtures. Comments are requested by 1/10/00.
- Nov 2<sup>nd</sup>: RSPA is reopening for comment a preemption determination, PDA-18R. For more information on this preemption action refer to 63 FR 42098 (8/6/98). Comments must be received before 12/17/99.
- Nov 8<sup>th</sup>: RSPA published a notice of public meeting in preparation for and to report the results of the 17<sup>th</sup> session of the UN Sub-Committee of Experts on the Transport of Dangerous Goods. See the docket of specific dates.
- Nov 10<sup>th</sup>: RSPA published further corrections on the HM-189P docket (miscellaneous amendments). Effective date goes back to 10/1/99 (how do they do that?).

• Nov 16<sup>th</sup>: RSPA published an ANPRM, docket HM-213A, requesting comments on a research study conducted by the U. of Michigan Transportation Research Institute (UMTRI) titled, "The Dynamics of Tank-Vehicle Rollover and the Implications for Rollover-Protection Devices." The intended effect of this action is to obtain information concerning the need, if any, for amending the HMRs concerning cargo tank rollover damage protection devices, the costs and benefits associated with such amendments, and ways to minimize impacts on small business. Comments are due by 5/15/00.

### THE USE OF A SALVAGE DRUM

is still causing confusion in everyday operations. The regulatory requirement for salvage drum use is located in §173.3(c). To begin with, a salvage drum is not an alternative to using specification packaging. Just because you discover a bad or leaking package does not authorize you to repack for transport using a salvage drum. The salvage drum exception is only for use if the package is already "in transportation." This means that: (1) the package has been accepted by the carrier; **or** (2) the shipper is loading/unloading the vehicle; **or** (3) the package is being transported; **or** (4) the package is being stored while in route to its consigned destination (e.g., storage incidental to transportation). That's it. Damaged or leaking packages, and clean-up of a leaking package at your facility – before or after transportation – does not fall into the scope of §173.3(c). In these cases, you must repackage the material/waste into a DOT authorized packaging; a salvage drum cannot be used to ship the material/waste unless it is the authorized packaging for the waste. This is not an easy option. The only way possible is if the type of salvage drum used is: (1) a liquid tested, single packaging; **AND** (2) tested to the highest applicable PG level of the waste contained; **AND** (3) the gross mass of the single packaging is not exceeded; **AND** (4) the vapor pressure of the liquid in the salvage drum (inner container) is within the allowable range based on the marked hydrostatic pressure on the outer drum. If these conditions are met, the packaging is not a salvage drum but rather an authorized packaging.

## Happy Birthday to Us

*The Hazmat News Network* is heading into its 5<sup>th</sup> year of publication. We at Regulatory Resources thank each of you for your support.

