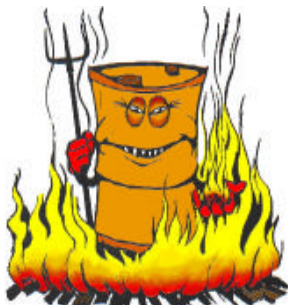




*The Hazmat News Network* provides information on regulatory actions, docket summaries, events, and services that may assist in establishing or maintaining regulatory compliance. If you do not want to be a part of *The Hazmat News Network*, call or send a facsimile to us and we will remove your name from this service. Regulatory Resources makes no warranties, direct or implied, concerning the accuracy of the information addressed. Wade A. Winters, CET, CHMM — 509-628-1020 — Fax: 509-628-0972 — email: rri@televar.com — October 1998



**HAPPY HAZMAT HALLOWEEN** from *The Hazmat News Network*. REGULATORY RESOURCES, INC. offers this free publication to help you in your hazardous materials and waste packaging and transportation duties. We hope you find it a benefit. Pass it around.

**MSDS NET ADDRESS.** It seems that the August 98 newsletter had a type-o in the email address for MSDSs. So, here's the correct one that links to MSDS heaven!

<http://www.chem.uky.edu/resources/msds.html>

**REGULATORY TRAINING IS AVAILABLE** that shows you what the regs state and how to apply them to your benefit. We explore compliance without forgetting the economical considerations. Call the number following the class for more information or to sign up.

- 11/16-11/20: Adv DOT Rad Pkg & Trans; Amarillo, TX; 509-628-1020
- 11/30-12/4: Adv DOT HazWst Pkg & Trans; Richland, WA; 509-372-7482
- 12/8: DOT Intrastate Regs (MOTs and Agriculture); Richland, WA; 509-372-7482
- 1/19-21/99: Transportation of Environmental Samples; Richland, WA; 509-372-7482
- 2/22-26: Adv DOT Rad Pkg & Trans; Richland, WA; 509-372-7482
- 3/22-26: Advanced Transportation Compliance for Inspectors/Enforcement; Richland, WA; 509-372-7482

**DOCKETS — AHHA, A BIT OF A BREATHER.** Here's what's happened the last month on the DOT hazmat scene.

- Sept 21<sup>st</sup>: The NRC amended its regulations concerning the low-level waste shipment manifest which went into effective on March 1, 1998 by removing expired provisions and rectifying an inadvertent change.
- Oct 1<sup>st</sup>: RSPA published a final rule (HM-1890) for editorial corrections and clarifications.
- Oct 2<sup>nd</sup>: RSPA is conducting a public meeting to discuss the requirements in the DOT Hazmat Regs applicable to transport of hazmat in certain bulk packagings (including IM 101 and 102, IBCs and DOT-E's). The meeting is November 17<sup>th</sup> in the Cajun Dome, Lafayette, LA. Call 202-366-8553 for info.
- Oct 9<sup>th</sup>: FHWA published a re-opening of the Out-of-Service docket and is requesting comments before Dec 9<sup>th</sup>.
- Oct 9<sup>th</sup>: FHWA announced its decision to exempt 12 individuals from the vision requirement of 49 CFR 391.41(b)(10).

**I DON'T MEAN TO PICK ON DOT OR NRC, BUT...** I just can't help it when these two agencies issue a guidance document for the classification and packaging of radioactive LSA and SCO and keep it a secret! Just over a year ago the NRC and DOT published a draft regulatory guidance document, NUREG-1608, concerning LSA/SCO. The NRC was kind enough to let "the public" know about availability of this draft in the Federal Register (because they wanted comments??). Then, I recently find out that they published the final guidance in July 1998 as RAMREG-003. But this time, shhhhhhhh, it's a secret. I'm confused, did they name it right? Anyway, the main sections address: (1) issues related specifically to SCO and to LSA; (2) issues relating to determination of the dose rate 3 meters from the unshielded material, object or collection of objects; and (3) issues relating to the preparations for shipment and the packaging of LSA and SCO. Next month I'll provide some of the gruesome details. To get your copy, contact the NRC dockets group (get the number at <http://www.nrc.gov>) and get your credit card ready...it's \$5 and must be paid before it's shipped.

**CORROSIVE SOLIDS AREN'T A FED ISSUE...gotcha!** The world of wastes brings up unique packaging and transportation issues. The EPA doesn't regulate characteristic only corrosive solids as RCRA hazardous wastes. Some states do, however, require consideration of these solids as regulated state wastes. The DOT's corrosive (Class 8) classification criteria regulates corrosive solids based on two main criteria: (1) destruction to skin tissue (ouch); and (2) corrosion rate to steel OR aluminum. This means that you can have a DOT regulated corrosive solid that is not regulated as a RCRA hazardous waste and may or may not be regulated by a state. Now the problem: container integrity. Consider a metal drum with wastes only contaminated with a corrosives (e.g., gloves, rags, clothing, plastics, etc.). Folks, condensation occurs — especially if stored a while before shipping. It doesn't take much condensate to create a very acidic/basic situation in these containers. Remember, DOT states that container integrity is the shipper's responsibility. What is a perfectly good drum may be leaking waste before it arrives at its destination. Take the extra step and add absorbent and/or a neutralizing material in the bottom of the packaging if you think this situation could occur. It's worth it.

**DON'T FORGET ABOUT THE NEW REGULATIONS** that went into place on October 1<sup>st</sup>. A big one from the enforcement side is the intrastate rule, HM-200, that imposes the Federal requirements to all in-state hazmat packaging and transportation activities. No one is exempted — lawn services, construction workers, pool maintenance, sales personnel...the list goes on. Give us a call, we'll help.