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AT THE STROKE OF MIDNIGHT,

OCTOBER 1, 1996 many recently, and not so recently, published dockets go into effect. Here are the major hitters in the hazmat transportation arena.

- **HM-181:** Elimination of the option of shipping regulated materials and wastes in non-bulk DOT specification packaging. (If you still have old DOT spec packaging (17E, 4B, etc.) in stock, don't throw them out; these unused packagings will meet the requirements of strong-tight packagings.)
- **HM-222A:** Miscellaneous amendments to remove unnecessary regulations (and we still have a 49 CFR?).
- **HM-222B:** Part II of the miscellaneous amendments to remove unnecessary regulations.
- **HM-216:** Miscellaneous amendments to the hazmat rail regulations...and some that impact other modes.
- **HM-220A:** New and revised requirements for the periodic inspection and testing of cylinders.
- **HM-220B:** Amendments to the restructuring of cylinder specification requirements.

DOT RSPA MOVES BACK IN to the 8th floor of the Nassif Building on Monday, September 23rd. For those of you who watch docket activity, the vacation is over.

WASTE SHIPPERS OFTEN MISIDENTIFY WASTES in the shipping descriptions. Waste codes apply to all RCRA hazardous wastes. Many waste shippers are code happy. DOT proper shipping names listed in 49 CFR 172.203(k)(3) require the shipper to identify, in the shipping description, the technical name of the material (two technical names for mixtures of different hazardous materials). Hazardous waste codes (e.g., D001) are NOT technical names. The only time a waste code is authorized in place of the technical name of the waste is when the waste is described as "Hazardous Waste Liquid, nos" or "Hazardous Waste Solid, nos." For all the other proper shipping names listed in § 172.203(k)(3), a technical name must be used and it must be the name of the material that most predominantly contributes to the hazard.



PACKAGING REQUIREMENTS FOR MATERIALS SHIPPED as small quantities per § 173.4 are often overlooked. Materials shipped under the small quantity exceptions, if in complete compliance with §173.4, are excepted from all other hazmat transportation requirements. Most shippers do well until packaging. The packagings used for small quantities require they be drop and stack tested in the configuration for which they will be shipped. Don't overlook this. The drop and stacking test for small quantities is similar as those required for UN packagings tested to a PG I performance level. The drop tests consist of five drops made from a height of 1.8 meters (5.9 feet) onto an unyielding surface with the package striking the: (1) flat bottom; (2) flat top; (3) flat long side; (4) flat short side; and (5) corner at the edge where two sides and the top or bottom meet. The compression test is the same as that for UN packagings as addressed in § 178.606(c). Make sure that you document the testing of the package. The simplest way to accomplish this is with a video camera. Remember, all of these tests require the package to be filled and closed with materials that accurately simulate the hazardous materials you will be shipping. Don't forget the other requirements for inner packagings and overall gross mass.

MIXED CONTENT PACKAGING IS AN EXCELLENT way to ship small amounts of different materials in the same outer packaging. Mixed content packaging has been authorized for air shipments in accordance with IATA/ICAO for some time. The changes brought about by docket HM-181 (December 1990) introduced mixed content packaging to domestic transportation. DOT mixed content packaging allows for materials to be placed in the same outer packaging as long as:

- all materials are compatible with the other materials
- all materials are compatible with the packaging
- the packaging is authorized for all materials
- the packaging meets the performance tests for the highest order of hazard of any one of the materials
- corrosive materials in bottles are packed in a second inner packaging (except ORM-Ds).

One advantage the DOT regulations have over the IATA/ICAO for mixed contents is that DOT does not limit the shipper to a maximum "Q factor" of material. This is a great allowance; use it! For more information about DOT mixed contents, refer to § 173.24a(c).

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