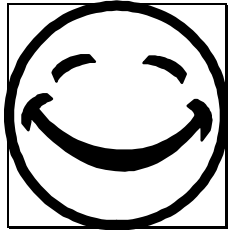


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From: Wade A. Winters, CET, CHMM (509) 628-1020, Fax: (509) 628-0972, email: rri@televar.com September 1997

HI EVERYBODY! Welcome to the September 97 issue of *The Hazmat News Network*. There is no charge for this newsletter.



If you think someone would like to receive a copy of *The Hazmat News Network*, have them give me a call or drop me a fax/e:mail. Sorry about last month's non-newsletter. We are in the process of moving the office; last month we moved out of our old office into a temporary office. What a joy! Please note the new mailing address and fax number. Things will be changing again in a couple months when we finally arrive at the new office.

DOCKET ACTIVITY IS BACK ON TRACK with lots of action these last couple of months. Here's a summary.

• July 22nd: DOT published a second final rule (editorial revisions and technical amendments) for docket HM-206, "Improvements to Hazardous Materials Identification System". The original final rule was published January 8, 1997. The bigger items here are:

- The postponement of this rule from October 1, 1997 to October 1, 1998 (life is good).

- The marking of the identification number on the ends and sides of the transport vehicle for non-bulk packages (172.302) now only applies if the material has the same proper shipping name and identification number, and the entire 4000 kg gross is loaded at one loading facility

- PIH marking (173.313) is not required if the package already displays the new PIH label or placard as long as the words "INHALATION HAZARD" are on the label or placard. However, the change is that if no wording is on the label or placard, the words "INHALATION HAZARD" must be marked on the package.

- The marking of the identification number on the ends and sides of the transport vehicle for non-bulk packages of PIH materials (172.313) now only applies to PIH materials: (1) in Zones A or B, and (2) with the same PSN and identification number, and (3) loaded at one loading facility.

- Cargo tanks loaded inside a transport vehicle and permanently attached to the transport vehicle are now only required to display the identification number of the hazmat on the side(s) and end(s) that are visible upon access to the cargo tank. Remember, the identification number must be displayed

on both sides and ends of the transport vehicle housing the cargo tank.

- The PIH labels and placards, as illustrated in the January final rule, have been modified. If you've already purchased the new labels/placards, make sure they're to the new specs. Compliance: October 1, 1999.

- Permanently marked safety slogans in placard holders (172.502) which were in place prior to August 22, 1997 cannot be displayed after October 1, 2001. If the safety slogan was placed in the placard holder on or after August 22, or the display is not a permanently marked display, the slogan must be removed by October 1, 1998.

- The carrier information contact requirement in 172.606 is revised so if an unattended transport vehicle separated from its motive power displays the identification number (per 172.332) for all hazardous materials contained in the vehicle, and all the identification number(s) is/are visible from the outside of the vehicle, then the carrier does not have to: (1) have the carrier's phone number displayed on the vehicle, or (2) have the shipping papers and emergency response information on the vehicle, or (3) maintain emergency response information like a facility operator.

• August 1: In a Safety Advisory Notice published July 14th, RSPA inadvertently failed to add the text "capable of being closed from a location" in 173.32c(g)(2). This corrects the omission.

• August 18: RSPA published an Advanced Notice of Proposed Rulemaking seeking comments regarding specific aspects of cargo tank motor vehicles and associated loading/unloading equipment used in liquefied compressed gas service. Comments are due to RSPA by October 17th.

• August 20: This Supplemental Notice of Proposed Rulemaking to docket HM-224A provides discussion on prohibiting oxidizers in Class D cargo compartments in cargo aircraft.

• September 2: This Direct Final Rule, HM-169B, removes the entire HM-169A Radiation Protection Program requirements which were to go into effect on October 1st. This is a very welcomed docket for those of us in the Class 7 packaging and transportation business. YES!

LOOKING FOR INPUT... to find out how many of you out there are interested in having this newsletter track FMCSR docket action as well as hazmat. Send me a fax or email if you're interested.

TRAINING IS CRITICAL TO SAFETY & COMPLIANCE. I know that this is old news to you, but I don't believe it can be over-stressed. Unfortunately, it often takes a tragedy to bring the necessary awareness of the need for a trained and qualified workforce. The regulators are aware of this need. So much so



that an undeclared package or hazardous materials aboard an aircraft brings an initial \$60,000 fine. One package, one time. Now, how many people can you have trained, and to what degree, for \$60,000? I'll tell you...Regulatory Resources can probably train your entire transportation division to a level unattainable in existing commercial training courses. If you want employees who can ship anything – include complex mixed wastes, inspect any type of package or shipment, and find the means to save money while maintaining compliance, then give us a call. I guarantee you'll be satisfied or I'll refund your money!!!