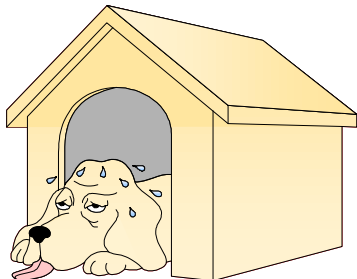


WE'RE STILL ALIVE! It's been almost three months since the last newsletter. The Christmas holiday was a nice break but short-lived. The 2003 year started hard and stayed that way for five weeks. Once I got back to the office my hard drive had a stroke. That cost another week...arggg. Oh well, we're back. Please feel free to pass this newsletter on to others you think will benefit.



REMEMBER WE HAVE A NEW EMAIL ADDRESS so you'll need to update your file. Please change us from "rri@televar.com" to "rri@charter.net". You can always get a hold of us at the address in the newsletter header as well.

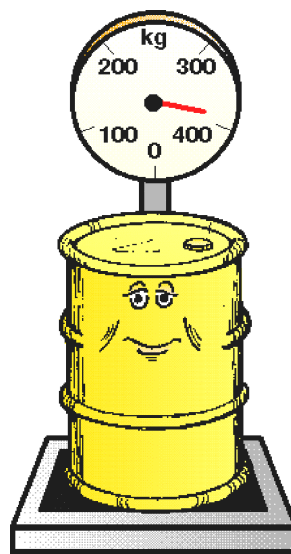
DOCKET ACTION these last three months has been tolerable. Here's what's been happening.

- **Dec 3rd:** RSPA published the NPRM, HM-215E, amending the HMRs to align them with the international standards. Comments were due on February 3rd. But please look through this and get late comments in ASAP. There are some hitters here (such as the revision to the flow of the basic description, requirement to identify subsidiary hazard class/division in the basic description, new ltd qty markings, a new air eligibility "certification" marking, and more). Naturally this docket was published just a week after our last newsletter!
- **Dec 12th:** RSPA published PDA-29(R) to notify and invite comment on a preemption issue concerning the MA State regulations on storage and disposal of infectious or physically dangerous medical or biological waste. The comment period expired on 1/27/03 with rebuttal comments due 3/12/03.
- **Dec 26th:** The EPA published a direct final rule and a proposed rule for an EPA Region III only pilot that removes cathode ray tubes (CRTs) from the definition of solid waste. This pilot does not affect the proposed ruling making on CRTs published on 6/12/02.
- **Jan 8th:** RSPA published the final rule short version of HM-215E, effective 1/1/03, to incorporate the most recent international modal regulations. This action was necessary to facilitate the continued transport of hazmat internationally.
- **Jan 9th:** RSPA published the final rule HM-208D, *Temporary Reduction of Registration Fees*. For three years (2003, 2004, and 2005) the registration fee per year is reduced for small business and non-profit orgs to \$150 (total). All others are subject to a \$300 fee. After the third year the fee increases to \$275 for small businesses and non-profit orgs and \$1,000 for all others. To see if you're subject go to 49

CFR 107. This rule is effective March 3, 2003.

- **Jan 21st:** RSPA published an NPRM, HM-218B, proposing miscellaneous amendments to the HMRs. Take a look at the changes and get your comments in to RSPA by 3/17/03.
- **Feb 10th:** RSPA published an ANPRM, HM-213B, *Safety Requirements for External Product Piping on Cargo Tanks Transporting Flammable Liquids*. RSPA is considering alternatives for reducing safety risks associated with the transportation of flammable liquids in unprotected wetlines on DOT spec cargo tanks. Comments are due by 6/10/03.

DON'T IGNORE THE PACKAGE LIMITS. I quite often am asked about the mass limit for package configurations such as labpacks (49 CFR 173.12(b)) and salvage drums (49 CFR 173.3(c)). In the case of a labpack, the maximum gross mass can never exceed 205 kg (§173.12(b)(2)(v)). However, you are always limited to the maximum gross mass marked on the UN package if it is less than 205 kg. The same applies to salvage drums. You can never exceed the maximum mass limit of the UN salvage drum. Please keep in mind that any non-bulk package weighing in excess of 400 kg net is not authorized without a DOT exemption. If the UN package to be used is a liquid tested, single package (e.g., 1A1, 6HA1, etc.), the maximum gross mass in kilograms is determined by multiplying the volume of the package (in liters) and the maximum density (SpG) of material authorized in the package.



For example, a 208 liter (55-gallon) PG II drum tested to a maximum solution density of 1.4 can be filled with a PG II solid to a gross mass 291 kg. If you're placing a PG III solid into the drum, the maximum gross mass is 1.5 times that for a PG II solid for a total gross mass of 436 kg (remember, the net mass cannot exceed 400 kg!). **On another point**, keep in mind that you cannot exceed the maximum density for any liquid in a liquid tested, single package. This even includes labpacks and salvage drums. For example, a UN 1A2/Z1.4/200/... is only authorized for a maximum solution density of 1.4 SpG. This applies even if configuring the package with inner receptacles. An inner receptacle containing a solution with a SpG above 1.4 will render the package out of compliance with the regulations, regardless of the amount of this solution in the package. OUCH!