



THE HAZMAT NEWS NETWORK



Regulatory Resources, Inc. 240 Joshua Road Kennewick, WA 99338

Voice: 509-628-1020 — Fax: 509-628-0972 — email: newsletter@regulatoryresources.net — www.regulatoryresources.net — July 07

SUMMER IS IN FULL SWING and we hope you're enjoying every minute of it! Welcome to the July 07 issue of **The Hazmat News Network** newsletter. It's free and it's to help you in your compliance needs. If you don't want to receive this simply send us an email with REMOVE.

SUMMER HEAT HAS KEPT THE DOCKET PACE SLOW. Here are the latest. Please note that we do not address Special Permit (formerly Exemptions) actions.

Jun 27th: The DOT (PHMSA) published a withdrawal of the ANPRM, HM-232A, "Security Requirements for Motor Carriers Transporting Hazardous Materials." The Transportation Security Administration has assumed the lead role for this rulemaking. The DOT will address the enhanced safety of explosives storage during transportation in another rulemaking.

Jul 2nd: The DOT (PHMSA) published a NPRM, HM-206F, "Revision of Requirements for Emergency Response Telephone Numbers". DOT is amending the hazmat regs to clarify requirements governing emergency response information services provided by arrangement with hazmat offerors by proposing to require that basic identifying information (offeror name or contract number) be included in shipping papers. Comments are due by August 31, 2007.

Jul 5th: The DOT (PHMSA) published Notice 07-5 to collect information pertaining to Hazardous Materials Public Sector Training and Planning Grants. Comments are due by September 4, 2007.

Jul 10th: The NRC published a notice to solicit proposed issues or to identify problems with the International Atomic Energy Agency (IAEA) Regulations for the Safe Transport of Radioactive Materials (TS-R-1). This action is a joint effort with DOT PHMSA. Proposed issues or identified problems will be accepted until August 15, 2007.

IT'S LAS VEGAS ONE MORE TIME!

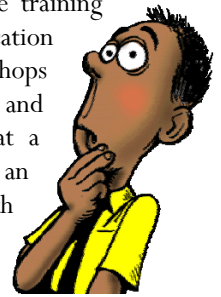
On August 29-30, RRI is presenting the *DOT Explosives Packaging and Transport Workshop*. This 2-day offering will be held at the Atrium Suites Hotel. We just finished an advanced radioactive materials transport course and had so much fun we're going back again. In this course we will spend the first day addressing the definitions unique to explosives, classification requirements for new explosives (including the new TB 700-2), and packaging options. The second day will be devoted to the hazard communication requirements and transport controls. Both days will be packed full of valuable and useful information. We still have some seats open so hurry and get your registration in. Information about this class and our other offerings is provided on the next page.



DON'T FORGET TO ORDER YOUR COPY OF our latest spreadsheet, *RRI Rad Calc*. This valuable tool uses MicrosoftTM Excel[®] so it can be loaded on your laptop and taken into the field with you. The *RRI Rad Calc* performs your DOT Class 7 material

calculations as well as selects the Class 7 label, verifies contamination limits, and validates your characterization data. Each CD contains the *RRI Rad Calc* program, User's Guide, and QA Test Documentation. We have single licenses, and group licenses of 4 and 8 sets. Visit our website to find out more about this or to order yours today. I'm sure you'll like it!

WHAT EXACTLY DO I NEED TO MEET DOT'S training requirements? This question comes up quite often and it's not an easy answer. First, you must understand that seminar style training offered by vendors cannot fulfill all your training needs. Sure, these courses and workshops do provide much of the training and, just as important, provide a focused application of a given topical area. We stress in our workshops the methods to find the necessary information and how to work through the process to arrive at a compliant package/shipment. But no one in an open-enrollment seminar can provide you with training specific to the packaging systems you use (e.g., filling and closure requirements), training specific to a DOT-SP (DOT-E) that is used, or the specifics required to fulfill your Security Plan training requirements. **There is always site-specific and function-specific training that must be performed by the employer!** Much of the training we provide is on-site, client specific training. When requested, RRI can address many of a client's necessary function-specific training needs. However, Security Plan training is something only a company can provide to their employees. Remember, there are five areas of training that will be inspected and enforced: (1) General Awareness/Familiarization; (2) Safety; (3) Security; (4) Function-Specific; and (5) Driver. The first four areas of training are present in 49 CFR Part 172, Subpart H. Driver training, however, is located in 49 CFR 177.816 and applies to anyone who transports any quantity of a DOT regulated hazardous material. You read correctly...anyone! This means that if you yourself transport a hazmat in a motor vehicle in the furtherance of a commercial enterprise (e.g., in commerce), you must be trained to the applicable requirements of 49 CFR 390 through 397 and §177.816. This requirement has absolutely nothing to do with possessing a Commercial Driver's License (CDL). It's really about the casual hazmat carrier (carrier is a defined term in §171.8). So, right now, if I were to ask you to provide proof of all DOT training requirements for each of your hazmat employees, how would you fair? Oh, one more thing. Sometimes managers feel the need to have to sign the certification statement on DOT shipping papers. **BEWARE!** Anyone who signs a shipper's certification must provide evidence of function-specific training and testing that ensures they are knowledgeable in the specifics within the certification statement and can determine that a shipment is in compliance with the HMR!





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RRI's 2007 Training Schedule

May 7-9 (til 11am)	DONE Initial DOT Hazardous Materials & Waste Packaging & Transport	Richland, WA
May 9 (at 1pm)	DONE Initial DOT Radioactive Materials Packaging & Transport	Richland, WA
June 26-29	DONE DOT & IATA/ICAO Radioactive Materials Packaging & Transport*	Houston, TX
July 9-13	DONE Adv DOT Radioactive Material Packaging & Transport	Las Vegas, NV
July 23-27	CLOSED Advanced DOT/RCRA Waste Packaging & Transport	Richland, WA
August 29-30	DOT Explosives Packaging and Transport	Las Vegas, NV
October 29 - Nov 2	Advanced Mixed Waste Packaging & Transport	Richland, WA
December 4-5	IATA/ICAO Dangerous Goods Packaging & Transport	Richland, WA
December 6-7	IATA/ICAO Radioactive Materials Packaging & Transport	Richland, WA

Training Location Information

Richland, WA 99338
[Hampton Inn](#)
 486 Bradley Blvd
 509-943-4400
 800-560-7809

Las Vegas, NV 89109
[Atrium Suites Hotel Las Vegas](#)
 4255 S. Paradise Road
 702-369-4400
 800-330-7728

Cost Information and Registration Form

May 7-9 (til noon)	Richland, WA	\$ 650 each	} Both classes for \$1195 each	Registration Form
May 9-11 (at 1pm)	Richland, WA	\$ 650 each		
June 26-29*	Houston, TX*	\$1145 each (\$995 for DGAC members)		Course Number HMT-601*
July 9-13	Las Vegas, NV	\$1395 each		Registration Form
July 23-27	Richland, WA	\$1295 each		Registration Form
August 29-30	Las Vegas, NV	\$ 675 each		Registration Form
October 29 - Nov 2	Richland, WA	\$1295 each		Registration Form
December 4-5	Richland, WA	\$ 675 each		Registration Form
December 6-7	Richland, WA	\$ 675 each		Registration Form

For course information, visit www.regulatoryresources.net. Registration forms for each course are hyperlinked in the above text. You can obtain the registration forms on our website. If you have questions, please contact us at training@regulatoryresources.net.