



THE HOLIDAY SEASON IS FAST APPROACHING



and we wish you all the very best this year. Welcome to our **free** newsletter...no catch, no calls...just important DOT hazmat and RCRA waste news. Please pass this on to others who may benefit. Starting next month we'll have been publishing THE HAZMAT NEWS NETWORK for eight years! Thanks for your support! Check out our website for past issues. Oh, if you don't want to be on distribution just email us with "REMOVE" and we'll take you off.

DOCKET ACTIONS for September and October started out slow but picked up in the end. Here's what happened. (See our website for a link to the U.S. Federal Register where you can obtain a .pdf file of each of these dockets.)

- **Sep 3rd**: RSPA published a response to appeals concerning the April 18, 2003 final rule, HM-213, "Requirements for Cargo Tanks." The effective date for this rule was 10/1/03.
- **Sep 10th**: RSPA published a NPRM to propose amending, to enhance safety, requirements pertaining to aluminum cylinders manufactured using aluminum alloy 6351-T6 (SCUBA, SCBA and O₂ cylinders). Comment by 11/10/03.
- **Sep 22nd**: RSPA published a decision on petition for reconsideration of administrative determination of preemption (PD-22(R)) modifying its 9/20/02 determination with respect to the fees specified in New Mexico's LNG and CNG Act and LP gas Standards for vehicle inspections, employee examinations, and identification cards.
- **Sep 26th**: RSPA published an interim final rule and extended the compliance date to 5/31/04 for HM-220D, "Approval Program for Certain Persons Performing Visual Requalification of DOT Specification Cylinders." (FR 8/8/02)
- **Sep 30th**: The FMCSA published three dockets: (1) "Transportation of Household Goods; Consumer Protection Regulations" (interim final rule and delay of compliance to 3/1/04); (2) Hours of Service of Drivers" (technical amendments); and (3) Miscellaneous Technical Amendments (effective 9/30/03). See 9/30/03 Federal Register for more information.
- **Oct 6th**: RSPA published the final rule, HM-189V, "Minor Editorial Corrections and Clarifications" to correct editorial errors, make minor changes and respond to requests for clarification. The changes were effective on 10/1/03.
- **Oct 14th**: RSPA published a notice for a public meeting on the proposed changes to the 2005 IAEA rad transport regulations, TS-R-1. The meeting is 11/5/03 at DOT in D.C.
- **Oct 28th**: The EPA is proposing to revise the definition of solid waste by de-regulating certain secondary materials that are recycled and to clarify what is meant by "legitimate recycling". EPA is attempting to identify a certain class or category of materials that EPA has determined are not discarded for purposes of the hazardous waste regulations. EPA states that they are proposing that any material which is generated and reclaimed in a continuous process within the same industry (as defined in the docket) is not

"discarded", provided that the recycling process is legitimate. Comments are due to EPA by 1/26/04.

- **Oct 30th**: RSPA published the long awaited final rule, HM-223, "Applicability of the Hazardous Materials Regulations to Loading, Unloading, and Storage." Here are the quick highlights (I'll be commenting in more depth in later newsletters). New terms have been added and other commonly used terms specifically defined. These are: (a) pre-transportation function; (b) transportation; (c) movement; (d) loading incidental to movement; (e) unloading incidental to movement; (f) storage incidental to movement; and (g) transloading. Other terms have been revised such as commerce, consignee, persons, and private track/private siding. A complete rewrite of 49 CFR 171.1 and 171.2 occurred, as well as major revisions to 49 CFR 174.67. If you're a person who performs any function whatsoever in preparing a hazmat for shipment (including you waste generators who add waste to containers and/or tighten the closures on your waste accumulation drums) or are a carrier of hazmat, you need to obtain this docket and read it carefully. The effective date is 10/1/04. More next month!

FINALLY, AS ALL OF YOU HAVE REQUESTED we are publishing our training schedule for next year. RRI will conduct a full series of training workshops covering the DOT hazmat regulations, IATA/ICAO regulations and RCRA waste regulations. All workshops will be held in Richland, Washington at the Hampton Inn on the banks of the beautiful Columbia river. We are adding all the class information to our website, including our training catalog, syllabuses, schedule, costs, and registration forms. Contact us if you need information before we get it on our website. Plan ahead to make sure there's room for you in the classes.

Feb 16-17:	Initial DOT Hazmat (Course 201)
Feb 18:	Initial DOT HazWst (Course 202)
Feb 18-20:	Initial DOT Rad (Course 203)
Mar 15-16:	IATA/ICAO DG (Course 401)
Mar 17-18:	IATA/ICAO Rad (Course 402)
Apr 27-28:	Initial DOT Rad (Course 203)
Apr 29-30:	Initial IATA/ICAO Rad (Course 402)
May 18-21:	Adv DOT Hazmat (Course 301)
Jun 14-18:	Adv DOT Waste (Course 302)
Jul 19-23:	Adv DOT Rad (Course 303)
Jul 24-25:	<i>Unlimited Hydroplane Race Weekend</i>
Jul 27-28:	UN Pkging (Course 305)
Jul 29-30:	Rad Pkging (Course 306)
Jul 31-Aug 1:	<i>Seattle SeaFair Race Weekend</i>
Aug 16-18:	Adv Op RCRA (Course 601)
Aug 19-20:	Adv LDR (Course 602)
Sep 13:	Retraining - DOT Hazmat (Course 501)
Sep 14:	Retraining - DOT HazWst (Course 502)
Sep 15:	Retraining - DOT Rad (Course 503)
Sep 16:	Retraining - IATA/ICAO Rad (Course 505)
Sep 17:	Retraining - IATA/ICAO DG (Course 504)