



March 21st - Spring finally arrives.

Safety Tips

Buckle up before you start driving.

- **Slow down!** Driving at reduced speeds is the best precautionary measure against any misfortune while driving on slippery roads.
- **Be alert.** Black ice is invisible and will make a road look like shiny new asphalt. Pavement should look grey-white in winter.
- **Don't use cruise control.** Winter driving requires you to be in full control at all times.
- **Reduce your speed** while approaching intersections covered with ice or snow.
- **Allow for extra traveling time** or even consider delaying a trip if the weather is inclement.
- **Drive with low-beam headlights on.** They are brighter than daytime running lights and turning them on also activates the tail lights, making your vehicle more visible.
- **Lengthen your following distance** behind the vehicle ahead of you. Stopping distance on an icy road is double that of stopping on a dry one.
- **Stay in the right-hand lane** whenever possible and use turn signals when changing lanes.
- **Steer with smooth and precise movements.** Changing lanes too quickly and jerky steering while braking or accelerating can cause skidding.
- **Slow down when you see a sign warning that you are approaching a bridge.** Steel and concrete bridges are slicker than roads that are insulated by solid ground.

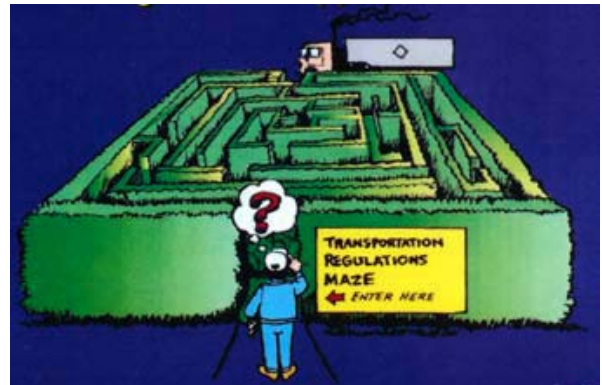
"spring is when you feel like whistling even with a shoe full of slush."

Unlisted Hazardous Substances – October 30, 2008 letter rescinded

The October 30, 2008 letter of interpretation that DOT printed concerning unlisted hazardous materials and their relationship with "unlisted hazardous waste characteristic" waste codes has been rescinded. The letter caused some conflict with an earlier letter of interpretation dated April 13, 2000 which indicated that unlisted hazardous materials can still become a hazardous substance if they contribute to "unlisted hazardous waste characteristic" waste codes. The EnergySolutions' office contacted the DOT Hotline and was told the October 30, 2008 letter was going to be rescinded. Earlier this month we confirmed the letter had indeed been rescinded and is no longer available for viewing.

The April 13, 2000 letter used 100% waste ethanol in their example. Ethanol is an unlisted hazardous material that contributed to a D001 waste code, therefore the RQ value would be for the D001 waste code (45.4 Kg).

Contributed by Julie Waddoups



Working our way through the maze of amazing regulations!!

Recent Industry Issues

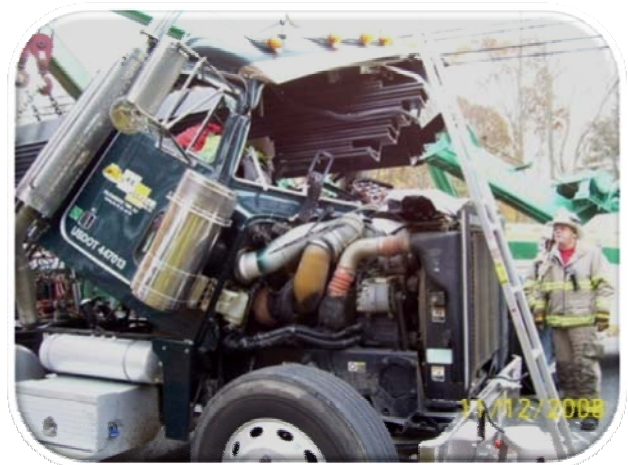


Be careful with every order from your specification communication vendors. Who will be in violation for the use of these placards: the manufacturer or the offeror? Does the placard inner border go all the way around?

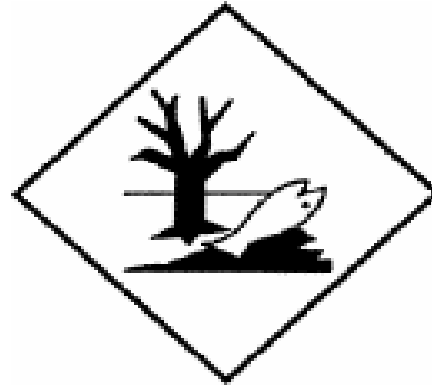


Diamond square-on-point border for class 7 identification numbers, is this legal??? This is only allowed for non-class 7 materials in limited quantities per 172.315. In a DOT letter of interpretation, it is stated that we should not use any specification markings from Part 172 for any class 7 excepted quantities.

I feel like a broken record, but every month I receive pictures like this. Tiedowns are obviously not enough to be safely used as a stand-alone system of load securement. This driver also trusted the minimum tiedown and equivalent means of securement rules with his life!



Harmonization to the Non-IAEA International Regulations



DOT has revised 49 CFR again. The final rule published in the federal register on January 14, 2009 was to harmonize with the international standards and regulations that recently changed. One change is the Cargo Aircraft Only label. The International Air Transport Association (IATA) will require the new CAO label starting January 1, 2013 and DOT has adopted the same start date. Another change is the marking for Marine Pollutants. The new International Maritime Dangerous Goods Code (IMDG) marine pollutant marking will be required January 14, 2010. The majority of the other changes in this final rule pertain to shipping batteries and are effective February 13, 2009.

Contributed by James Leonard

DOT Letters of Interpretation

28 Letters of Interpretation were published in January, and 24 Letters of Interpretation were published in February. Here's a quick summary of two of those letters. Do not rely on these summaries for regulatory guidance, but read the complete version of the letters on the PHMSA Web Site: <http://www.phmsa.dot.gov/hazmat/regs/interps/date>

Contributed by Julie Waddoups

Ref. No.: 08-0291, dated February 11, 2009

The shipping name Flammable liquid, toxic, corrosive, n.o.s (UN3286) better describes a hazardous material that is 3, PGII, 8, PGII, 6.1, PGIII than the shipping name Flammable liquids, corrosive, n.o.s. (UN2924) even if it doesn't follow the subsidiary hazard precedence.

This letter allows use of a proper shipping name that doesn't follow the order of precedence for the hazardous material.

Ref. No.: 09-0006, dated January 27, 2009

"TP" is not an acceptable abbreviated identification for type of packaging for stand-alone articles such as transformers, rectifiers, and insulating bushings containing PCBs on a shipping paper. Additional information may need to be added on a Uniform Hazardous Waste Manifest in box #14 to comply with the HMR requirement to identify container type.

This letter indicates that manifest abbreviations do not meet the requirements of identification of container type. DOT suggest either placing additional container type information in box #14 of the manifest or having two shipping papers, a manifest and another shipping paper to fulfill the DOT required information.

Load Securement Myths or What not to do and when not to do it

As an instructor for Federal Motor Carrier regulations, I have the opportunity to exchange stories with drivers about the load securement incidents they know about, some first hand.

Over the years I have heard a lot of excuses why a driver has a load fall off a truck. The regulation in 49 CFR 393.100 sums up the requirement 393.100 (b) Prevention against the loss of load, and 393.100 (c) Prevention against shifting of a load. In other words the load must be secured so that it will not fall off or shift.

This article looks at 4 common “myths” that I hear over and over again as the reasons why some loads are lost.

A myth is something generally not true but which, when licensed gives strength to a belief or justification for action or inaction.

Myth 1 – Load securement is not necessary when going short distances.

This becomes so dangerous because distance does not have anything to do with the forces that move a load on or in a vehicle. Any distance can present dramatic changes in velocity or direction.

This front loader was not secured correctly because they were not going very far. The driver was killed when the front loader broke free and crushed the cab. We are not sure of the speed, but the combination of low boy trailer and abrupt stop was too much for the inadequate securement devices.

Fact 1 – All loads must be secured regardless of the distance.



Myth 2 – Load securement is not necessary except when on a highway.



This happened in a parking lot. The driver said, “We haven’t secured loads like this for thirty years. We’re only going from the back of the building to the front” In fact they were only going 5 – 10 mph.

Fact 2 – Loads should be secured always!

Myth 3 – Load securement is not necessary in a closed box van.



When cargo is in a closed van the chance of losing the load is minimal, but the damage to cargo and to the stability of the vehicle is at risk. This picture has a heavy item up high and no bracing or load locks to prevent the load from shifting. This can drastically impact the center of gravity and produce adverse weight distribution that will disrupt the safe operation of the vehicle. Not only that, but would you like to unload this!!!

Fact 3 – All loads must be secured from movement.

Load Securement Myths Cont'd



Myth 4 – Anyone can secure a load

The first picture is an item that was on the trailer in the second picture. This trailer was not loaded by the driver of the vehicle or by anyone trained in the proper load securement process. This is OK if the loaders understand the reasons for load securement and the methods that can best keep the loads secure. The other piece of the puzzle here is that the driver is always responsible for proper load securement on the vehicle they are driving, even if someone else loads the truck. Luckily this happened on a closed site where damage or danger to the public or personnel was minimized.

Fact 4 – Drivers are responsible to ensure their loads are secure and anyone loading and securing a load must be trained and understand the requirements for load securement.

Combat the myths of load securement. Ensure all loaders are trained and knowledgeable. Loading and securing cargo to or in a vehicle is a vital step in the safe and secure transportation of hazardous material.

Contributed by Steve Anglesey

Training Courses Coming Up in the 2nd Quarter 2009



Date	Training Session	Location
All courses meet both DOE and DOT requirements.		
4/6 - 8/2009	Basic Hazardous Materials Transportation Training (Mod 1)	Richland, WA
4/8/2009	Basic Hazardous Waste Transportation Training (Mod 2)	Richland, WA
4/9 - 10/2009	Basic Radioactive Material Transportation Training (Mod 3)	Richland, WA
4/7 - 8/2009	Advanced Hazardous Material Shipper Certification Training	Richland, WA
4/13 - 16/2009	Advanced Mixed Waste Shipper Certification Training	Richland, WA
4/14 - 15/2009	Advanced Hazardous Materials Shipper Certification Training	Las Vegas, NV
4/21/2009	Hazardous Materials General Awareness Transportation Training	Richland, WA
4/22/2009	Hazardous Materials Drivers Training	Richland, WA
5/5/2009	Hazardous Materials General Awareness Transportation Training	Richland, WA
5/6/2009	High Route Controlled Quantity (HRCQ)	Richland, WA
5/6/2009	Hazardous Materials Drivers Training	Richland, WA
5/12/2009	Hazardous Materials General Awareness Transportation Training	Las Vegas, NV
5/13/2009	Federal Motor Carrier Safety Regulations for Drivers	Las Vegas, NV
5/12 - 14/2009	Advanced Hazardous Waste Shipper Certification Training	Richland, WA
5/19 - 21/2009	Advanced Hazardous Waste Shipper Certification Training	Las Vegas, NV
5/19/2009	Federal Motor Carrier Safety Regulations for Drivers	Richland, WA
5/21/2009	Hazardous Materials General Awareness Transportation Training	Richland, WA
6/9 - 11/2009	Advanced Radioactive Material Shipper Certification Training	Richland, WA
6/9/2009	Hazardous Materials General Awareness Transportation Training	Richland, WA
6/11/2009	Hazardous Materials Drivers Training	Richland, WA
6/10/2009	Federal Motor Carrier Safety Regulations for Drivers	Richland, WA
6/16/2009	Load Securement for Drivers & Traffic Personnel	Richland, WA
6/16 - 18/2009	Advanced Radioactive Material Shipper Certification Training	Las Vegas, NV
6/22 - 24/2009	Basic Hazardous Materials Transportation Training (Mod 1)	Las Vegas, NV
6/24/2009	Basic Hazardous Waste Transportation Training (Mod 2)	Las Vegas, NV
6/25 - 26/2009	Basic Radioactive Material Transportation Training (Mod 3)	Las Vegas, NV
6/26/2009	Hazardous Materials Drivers Training	Las Vegas, NV
These courses also meet the requirements of NRC IE Notice 79-19.		
4/27 – 5/1/2009	4-Day Basic Radioactive Waste Packaging, Transportation and Disposal & 1-Day IATA Training	Las Vegas, NV
6/15 – 19/2009	5-Day Basic Radioactive Waste Packaging, Transportation and Disposal Training for New Shippers	Mt. Pleasant, SC

This Month's quote.....

Anyone can do any amount of work provided it isn't the work he's supposed to be doing at the moment.

The MODERATOR is the official Training Services Newsletter for EnergySolutions
 This newsletter can also be viewed on our web site at www.energysolutions.com