

KEEPING THE NUCLEAR AND HAZMAT TRANSPORTATION INDUSTRY INFORMED OF REGULATORY CHANGES AND UPDATES

IMPORTANT DATES TO REMEMBER

- September 30, 2020**
 Begin using NUREG/BR-0204 Revision 3 and new NRC LLRW manifests
- May 10, 2021**
 Delayed compliance on May 11, 2020 final rule HMR changes
- September 1, 2021**
 Begin SQG EPA re-notification and every four years

NRC UPDATES ADVANCED NOTIFICATION DESIGNEE LIST

The Nuclear Regulatory Commission (NRC) has updated the list of individuals to receive advance notification of radioactive material and nuclear material shipments required by either 10 CFR Part 37 (Category 1 and 2), Part 71 (HRCQ) or Part 73 (Spent Nuclear Fuel) on September 9, 2020. This list of States, Territories and Participating Tribes designees can be downloaded from the NRC website at <https://scp.nrc.gov/special/designee.pdf>.

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Small Quantity Generator New Re-Notification Requirement

Small Quantity Generators (SQGs) have a new requirement to re-notify EPA (or their state environmental agency) as to their generator status every four (4) years. The purpose of the re-notification requirement is to improve the SQG universe data and to maintain more accurate data into the future for outreach, compliance assistance and oversight activities by the EPA. The [2016 Hazardous Waste Generator Improvements Rule](#) finalized this requirement for all Small

Quantity Generators of hazardous waste to re-notify EPA of their hazardous waste activities every four years by completing and submitting the Notification of Resource Conservation and Recovery Act (RCRA) Subtitle C Activities (Site Identification Form) in full, also known as [EPA Form 8700-12](#), or state equivalent. Many states have opted into the EPA's MyRCRAID. MyRCRAID is an electronic reporting system for submitting the EPA Site ID form. The EPA is encouraging SQGs to

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CVSA Creates Out-of-Service Criteria App

The Commercial Vehicle Safety Alliance (CVSA) has recently released their April 1, 2020 edition of the North American Standard Out-of-Service Criteria (OOSC) in an "app" format, available in either the Apple or Google Play App stores. The CVSA OOSC app contains the roadside safety inspection out-of-service criteria for Commercial Motor Vehicles (CMVs); inspection bulletins; pictorials; online training; inspection procedures; operational policies; inspection and educational videos; brochures; and webinars. Local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives use this information



to identify critical driver and vehicle violations that would render the driver, vehicle and/or cargo out of service until the adverse condition(s) can be corrected. The CVSA OOSC app or handbook is also highly recommended for shippers to ensure their shipment is in full compliance prior to leaving their site as a human performance tool. Peer checking the shipment, driver

and conveyance equipment prior to the start of transportation will help minimize the risk of any transportation delays. The OOSC handbook is also and still available directly from the CVSA in either hard-copy or PDF format at their [online store](#).

Is Natural Radioactivity Regulated?

The answer is "YES!" Any material with natural radionuclides must be properly characterized and controlled. One person in Kentucky found out the hard way, when he shipped and disposed of Technologically Enhanced Naturally Occurring Radioactive Material (TENORM) to a landfill not licensed to accept this type of waste according to an [article](#) published by the Lexington Herald Leader written by Bill Estep dated July 17, 2020. This article mentioned the individual knew the material



contained high levels of natural radioactivity but chose not to disclose the hazards to the drivers, nor the landfill. A federal grand jury indicted him, which could mean penalties and/

or jail time. The U.S. Department of Transportation (DOT) would also call this an undeclared shipment, which the person could be fined and/or receive jail time per 49 CFR 107 Subpart D "Enforcement." There are some exceptions and exemptions



for Naturally Occurring Radioactive Material (NORM), but DOT's Class 7 definition in 49 CFR 173.403 includes the phrase "**any** material containing radionuclides" (emphasis added). The Pipeline and Hazardous Material Safety Administration (PHMSA) also stated in their Letter of Interpretation 13-0157 dated December 19, 2013 TENORM is not "natural material" and is not allowed to use the NORM exemption listed in 49 CFR 173.401(b)

(4) because of the industrial processing. Examples of TENORM are fracking water, fracking water collection pit solidified sludge, and filter cake from the treatment and recycling of fracking water because it is no longer a natural material as found in nature, it is in a form manipulated by human application. In addition to DOT, the [U.S. Nuclear Regulatory Commission](#) (NRC), [U.S. Environmental Protection Agency](#) (EPA), [Occupational Safety and Health Administration](#) (OSHA), [U.S. Department of Energy](#) (DOE), and [individual States](#) are involved with the



safety of handling, storing, transport and disposal of NORM/TENORM. So, be careful as you characterize any material for transportation and disposal.

SQG, continued

use MyRCRAID to submit the re-notification online, if that is an option in your state. SQGs can find [more information about MyRCRAID here](#) and learn how to submit the re-notification online. The first re-notification is due by **September 1, 2021**, and then every four years thereafter i.e., September 1, 2025, September 1, 2029, etc. This re-notification requirement is currently effective in authorized states that have adopted the Generator

Improvements Rule, as well as non-authorized states (Iowa and Alaska), Indian Country and most U.S. Territories. Please [see EPA's map](#) of where the Generator Improvements Rule is currently in effect. The EPA is also encouraging Treatment, Storage and Disposal Facilities (TSDFs) to help get the word out to their SQG customers as well. Outreach materials for TSDFs can be found in various formats on the [EPA's website](#).

2020 Emergency Response Guidebook Now Available!



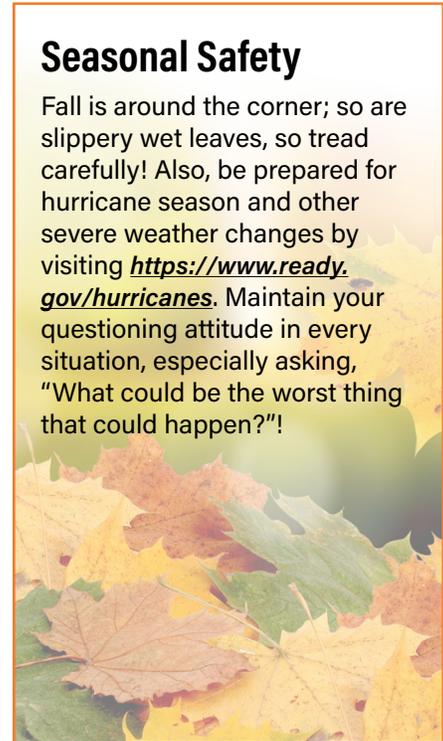
to do during the critical first 30 minutes of a Hazardous Material (HazMat) transportation accident. HazMat shippers can also use the ERG to help meet the Emergency Response (ER) information requirement in Subpart G of 49 CFR Part 172. HazMat ship-

The newly updated Emergency Response Guidebook (ERG) was released August 05, 2020 by the Pipeline and Hazardous Material Safety Administration (PHMSA) on their [website](#) in [Data Files](#), [PDF](#), [Mobile App](#) and [Windows Software](#) formats. The primary purpose of the ERG is to provide first responders with a go-to manual that offers guidance on what

ers are required to print and include ER information with their HazMat shipping papers. When using a printed copy of these ERG guides (orange and green pages), the shipper will also need to add the full shipping description on them to meet all the required ER information outlined in 49 CFR 172.602(a).

Seasonal Safety

Fall is around the corner; so are slippery wet leaves, so tread carefully! Also, be prepared for hurricane season and other severe weather changes by visiting <https://www.ready.gov/hurricanes>. Maintain your questioning attitude in every situation, especially asking, "What could be the worst thing that could happen?!"



Emerging Transportation Technology Council Created

Inventors and investors of new transportation technology, such as tunneling, hyperloop, autonomous vehicles and other innovations, may face uncertainty about how to coordinate with the [U.S. Department of Transportation \(DOT\)](#) and its nine (9) operating administrations (OAs). Each OA has its own traditional jurisdiction over certain environmental and regulatory approvals. One OA example is the [Federal Motor Carrier](#)

[Safety Administration \(FMCSA\)](#) which its primary mission is to prevent Commercial Motor Vehicle (CMV)-related fatalities and injuries. New technology may or may not fit into the CMV definition or be regulated FMCSA. So, DOT has created the [Non-Traditional and Emerging Transportation Technology \(NETT\) Council](#) as the deliberative body within the DOT tasked with identifying and resolving these jurisdictional

and regulatory gaps for new technologies. The NETT Council will address these challenges by ensuring that the traditional modal OAs at DOT do not impede the safe deployment of new technology. Furthermore, it will give project sponsors a single point of access to discuss plans and proposals with DOT. For more information on the NETT Council, download their guidance document [Pathways to the Future of Transportation](#).

Recent Lessons Learned, Industry Events, and Operating Experiences



Missing Markings!?! At first glance, the communications for this conveyance may look good. How many orange panel markings are required on the outside of a personnel barrier (closed transport) when the orange panels on the bulk package contained inside, cannot be seen? The right answer is "4" orange panels, one on each side of the conveyance per 49 CFR 172.331(c). Also, how

close should the orange panels and placards be mounted? The right answer is in proximity to each other per 49 CFR 172.334(f). The term "proximity" is defined as "the state of being very near or close" by the Merriam-Webster [online dictionary](#). Law enforcement has issued violations for this in the past during routine roadside inspections.



Lacking Label? What happened to the written information on this label? Looks like the ink got waterlogged or faded during transport. Be careful, all entries on DOT Radioactive specification labels must be legibly printed, manual or mechanical, and be durable weather resistant per 49 CFR 172.403(g). And a recommendation, if possible, fill out a few more extra labels for the driver to replace or cover over any bad package labels like this one.



Priceless Placarding! Are words important? Hopefully, you said, "YES!" for many reasons. In the case of this class 7 placard, we are missing the words "Radioactive" per 49 CFR 172.519 and 172.556. Also, did you note where the bottom of the yellow triangle is? The international class 7 placard design does land on the center horizontal part, but this was a domestic USA shipment. Using the 172.556(b) design requirements, the base of the yellow triangle shall be 1.1 inches +/- 0.2 inches above the placard horizontal center line.

FAQ: HazMat Shipping Paper General Requirements

*** Is it permissible for a shipper to prepare, sign and date a shipping paper even though the initial carrier may not sign and date the shipping paper until 3 or 4 days later?** (Reference # 00-0114)

Yes, two different dates are acceptable. The hazardous material regulations do not prohibit the use of different shipper and initial carrier dates on the shipping paper.

*** Do I have to use SI units for the weight on shipping papers?** (Reference # 06-0053)

No, pounds (lbs.) is acceptable if the units of measurement are included on the shipping paper.

*** Can I abbreviate "Department of Transportation" in the shipping paper certification statement?** (Reference # 06-0053)

No. The certification statement must be written as specified in 49 CFR 172.204(a)(1) and may not be modified. Therefore, the abbreviation "DOT" is not acceptable.

*** Can I use the EPA UHWM packaging abbreviations on DOT shipping papers?** (Reference # 07-0196)

Yes, the EPA abbreviations are commonly accepted and recognizable. For example, "TT" maybe used to indicate a cargo tank (tank trucks) on the shipping paper.

*** Can I use "Excepted Package, Industrial Package, Type A Package, or Type B Package" to describe the type of packaging for class 7 material on a DOT shipping paper?** (Reference # 09-0110)

Yes, these abbreviations are acceptable for describing the type of package on the shipping paper. (Editor's note: These do not seem descriptive enough to help emergency responders to differentiate between packages on a conveyance. Consider using "Drum, box, freight container, cylinder, etc.).

Is it permissible for the driver to use electronic equipment to display shipping papers while the shipment is in transportation? (Reference # 04-0207)

No. Electronic versions of the shipping papers are not acceptable while in transportation. The shipper paper must be legible and printed (manually or mechanically) in English.

DOT letters of interpretation can be found at: <https://www.phmsa.dot.gov> Click on: "Regulations and Compliance" then "Interpretations" Next, you can search by entering the reference number in the search box or search by the applicable regulatory section number, or search by the published date. Do not forget that you have these internet addresses (and many more) in a PDF on our training class e-media handout.



THE LATEST HAPPENINGS

IN THE FEDERAL REGISTER

FMCSA Updates National HazMat Route

Registry. On June 03, 2020 (85 FR 34284), the Federal Motor Carrier Safety Administration (FMCSA) published a notice about making revisions to the National Hazardous Materials Route Registry (NHMRR) reported to the FMCSA from April 1, 2019 through March 31, 2020. The NHMRR is a listing, as reported by States and Tribal governments, of all designated and restricted roads and preferred highway routes for transportation of Highway Route Controlled Quantities of Class 7 (Radioactive Materials) (HRCQ/RAM) and Non-Radioactive Hazardous Materials (NRHM). More information on the NHMRR can be found on the [FMCSA website](#). This notice and changes are effective on June 3, 2020.

PHMSA Seeking Comments on Safety

Devices. On June 09, 2020 (85 FR 35368), the Pipeline and Hazardous Material Safety Administration (PHMSA) published a notice requesting public comments on developing a national policy regarding safety devices (UN0503 and UN3268). PHMSA has continued to see advancements in technologies for articles containing hazardous materials that have been submitted to PHMSA requesting an approval or special permit to transport as safety devices (UN0503 and UN3268). PHMSA is requesting information or data from stakeholders regarding the classification, testing, and conditions for transportation of these devices requesting an approval to be classified as safety devices. Interested persons are invited to submit comments on or before August 10, 2020. Comments received after that date will be considered to the extent practicable.

PHMSA Seeking Your Feedback. On June 12, 2020 (85 FR 35995), the Pipeline and Hazardous Material Safety Administration (PHMSA) published a notice requesting comments on the development of a Generic Information Collection Request for the collection of qualitative feedback on agency service delivery for approval under the Paperwork Reduction Act. Qualitative feedback means information

that provides useful insights on perceptions and opinions, but is not a statistical survey that yields quantitative results that can be generalized to the population of study. PHMSA expects to use various methods (e.g., customer satisfaction surveys, comment cards), to solicit feedback. This feedback will provide insights into customer or stakeholder perceptions, experiences, and expectations, provide an early warning of issues with service, or focus attention on areas where communication, training, or changes in operations might improve delivery of products or services. This notice announces PHMSA's intent to submit this collection to the Office of Management and Budget for approval and allows for an additional 30 days of public comment. Interested persons are invited to submit comments on or before July 13, 2020.

DHS Adjusts Civil Monetary Penalties. On June 17, 2020 (85 FR 36469), the Department of Homeland Security (DHS) published a final rule making the 2020 annual inflation adjustment to its civil monetary penalties. The Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015 (2015 Act) was signed into law on November 2, 2015. Pursuant to the 2015 Act, all agencies must adjust civil monetary penalties annually and publish the adjustment in the Federal Register. These would include civil penalties assessed by DHS and its components, the Cybersecurity and Infrastructure Security Agency (CISA), U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), the U.S. Coast Guard (USCG), and the Transportation Security Administration (TSA). Accordingly, this final rule adjusts DHS's civil monetary penalties for 2020 pursuant to the 2015 Act and OMB guidance. The new penalties will be effective for penalties assessed after June 17, 2020 whose associated violations occurred after November 2, 2015. This rule is effective on June 17, 2020.

FMCSA Extends Permitted HOS Exemption to 2025. On June 24, 2020 (85 FR 38016), the Federal Motor Carrier Safety Administration (FMCSA) published a notice announcing its

decision to renew the exemption from the minimum 30-minute rest break provision of the Agency's hours-of-service (HOS) regulations requested by the Specialized Carriers & Rigging Association (SC&RA) for certain commercial motor vehicle (CMV) drivers. The exemption covers drivers for all specialized carriers transporting loads that exceed normal weight and dimensional limits "oversize/overweight (OS/OW) loads" and require a permit issued by a government authority. FMCSA has analyzed the exemption application and the public comments and has determined that the exemption, subject to the terms and conditions imposed, will likely achieve a level of safety that is equivalent to, or greater than, the level that would be achieved absent such exemption. The exemption is applicable from June 18, 2020 through June 17, 2025.

TSA Extends RFI Comment Period to

August. On June 24, 2020 (85 FR 37958), the Transportation Security Administration (TSA) published a notice of public meeting and extension of comment period specifically for the Request for Information (RFI) from the air cargo industry (including manufacturers, shippers, suppliers, warehouses, e-commerce fulfillment centers, third-party logistics providers and air carriers) relating to compliance with international security standards for the transport of air cargo by commercial aircraft operators (April 10, 2020 - 85 FR 20234). In advance of the closing date for comments submitted in response to the RFI, TSA will hold a public meeting on July 29, 2020, to answer questions regarding the international standards discussed in the RFI and to provide an additional forum for comments by stakeholders and other interested persons regarding the issues identified in the RFI. In light of the current COVID-19 public health crisis, the public meeting will be virtual. TSA is also extending the comment period for the RFI to provide an additional period for comments to be submitted after the public meeting. The virtual public meeting will be on July 29, 2020, via telecon, beginning at 10:00 a.m. (EDT). The comment period on the RFI is extended from July

THE LATEST HAPPENINGS



IN THE FEDERAL REGISTER

9, 2020, to August 27, 2020.

EPA Revises 40 CFR Part 261 Appendix I

Location. On June 26, 2020 (85 FR 38330), the Environmental Protection Agency (EPA) published a notice correcting its regulation in 40 CFR Part 261 concerning the proper location of Appendix I to Part 261 – Representative Sampling Methods. EPA is revising its July 1, 2019 edition of 40 CFR Parts 260 to 265 by removing Appendix I to Part 261 currently located before Subpart I on Page 155, and adding it in numerical order after the last section (40 CFR 261.1090) in the Part 261, above Appendixes II–III to Part 261 on Page 220.

NRC Issues NUREG/BR-0204 Rev 3. On July 02, 2020 (85 FR 39936), the Nuclear Regulatory Commission (NRC) published a notice about issuing Revision 3 to NUREG/BR-0204, , "Instructions for Completing NRC's Uniform Low-Level Radioactive Waste Manifest." This document provides instructions to prepare NRC Form 540 (Uniform Low-Level Radioactive Waste Manifest "Shipping Paper"), NRC Form 541 (Uniform Low-Level Radioactive Waste Manifest "Container and Waste Description"), and NRC Form 542 (Uniform Low-Level Radioactive Waste Manifest "Manifest Index and Regional Compact Tabulation"), which have also been revised. The changes between Revision 2 and Revision 3 include: (1) Updated instructions to reflect changes to the Uniform Manifest Forms; (2) Updated references to U.S. Department of Transportation (DOT) regulations to reflect the current DOT regulations; (3) Additional discussion on the reporting of inventories based on lower limit of detection values, the potential use of indirect methods to determine these inventories, and the use of indirect methods in waste classification calculations; (4) Added clarification of the intent of the certification statement on Form 540; and (5) Made overall improvements to the clarity of the document. NUREG/BR-0204, Revision 3 and its forms became effective on July 2, 2020. Revision 3 can be downloaded from the [NRC Document Collection website](#) and the updated forms can be found on [here](#). Use of the NUREG/BR-0204, Revision 2 and its forms should be discontinued

on or before September 30, 2020.

FMCSA Renews DOE Driver HOS Exemption.

On July 06, 2020 (85 FR 40380), the Federal Motor Carrier Safety Administration (FMCSA) published a notice announcing its decision to grant the application of the U.S. Department of Energy (DOE) for a renewal of its exemption from the 30-minute rest break provision of FMCSA's hours-of-service (HOS) regulations for commercial motor vehicle (CMV) drivers. DOE currently holds an exemption for the period through June 29, 2020, which enables DOE's contract motor carriers and their employee-drivers engaged in the transportation of security-sensitive radioactive materials to be treated similarly to drivers of shipments of explosives. The exempted drivers will be allowed to use 30 minutes or more of on-duty "attendance time" to meet the HOS rest break requirements providing they do not perform any other work during the break. The requested exemption renewal is effective from June 30, 2020, through September 29, 2020.

EPA Modernizes Ignitable Liquids

Determinations. On July 07, 2020 (85 FR 40594), the Environmental Protection Agency (EPA) published a final rule updating its regulations in 40 CFR Parts 63, 260, 261 and 278 for the identification of ignitable hazardous waste under the Resource Conservation and Recovery Act (RCRA) and to modernize the RCRA test methods that currently require the use of mercury thermometers. These revisions provide greater clarity to hazardous waste identification, provide flexibility in testing requirements, improve environmental compliance, and, thereby, enhance protection of human health and the environment. This final rule is effective on September 8, 2020. The incorporation by reference of certain publications listed in the rule is approved by the Director of the Federal Register as of September 8, 2020.

NRC Issues RegGuide 74 Revision 2. On July 08, 2020 (85 FR 41072), the Nuclear Regulatory Commission (NRC) published a notice about issuing Revision 2 to Regulatory Guide (RG)

74, "Leakage Tests on Packages for Shipment of Radioactive Material." This RG (Revision 2) endorses the methods and procedures developed by the Standards Committee on Packaging and Transportation of Radioactive and Nonnuclear Hazardous Materials, N14 Subcommittee of the American National Standards Institute (ANSI) in ANSI N14.5-2014, "American National Standard for Radioactive Materials - Leakage Tests on Packages for Shipment," dated June 19, 2014. Revision 2 to RG 74 is available on July 8, 2020 and can be downloaded from the [NRC website](#).

DOT Future Transport Pathways Comment

Request. On July 28, 2020 (85 FR 45468), the Department of Transportation (DOT) Office of the Secretary of Transportation (OST) published a notice inviting the public to comment on the new document, "Pathways to the Future of Transportation." The pathways document is intended to help readers understand the purposes of the Non-Traditional and Emerging Transportation Technology (NETT) Council and its methods of operation; the principles informing the Department policies in transformative technologies; the high-level overview of the framework for non-traditional and emerging technologies; how the NETT Council will engage with innovators and entrepreneurs to enhance the Nation's transportation system; and the next steps of the NETT Council. The pathways document is available at www.transportation.gov/nettcouncil. Comments are requested by September 28, 2020.

Federal Semi-Annual Regulatory Agendas

- August 2020. On August 27, 2020, the Department of Energy (85 FR 52700); the Department of Labor (85 FR 52730); the Department of Transportation (85 FR 52738); the Department of Homeland Security (85 FR 52716); the Environmental Protection Agency (85 FR 52764); and the Nuclear Regulatory Commission (85 FR 52858) published their respective notices making available their portion of the semi-annual Unified Agenda of Federal Regulatory and Deregulatory Actions.

2020-21 COMMERCIAL OPEN-ENROLLMENT TRAINING SCHEDULE

Radioactive Class 7 Material Packaging, Transportation & Disposal Regulatory Compliance Courses

Q32020NEWS

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All DOT/NRC training courses meet the requirements of 49 CFR Part 172 Subpart H and NRC IE Notice 79-19

COURSE	DATE	CEU**	TUITION	LOCATION
2020				
DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	October 12 - 15	40	\$1,995	Hilton Head, SC
Air Transport of Radioactive Materials (IATA/DOT)	October 16	8	\$985*	Hilton Head, SC
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DOT/NRC/EPA Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal	November 2 - 6	40	\$2,095	Clinton, TN
Bear Creek Operations (BCO) Facility Tour	November 5	--	\$0	Clinton, TN
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DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	December 7 - 10	40	\$1,995	Henderson, NV
Air Transport of Radioactive Materials (IATA/DOT)	December 11	8	\$985*	Henderson, NV
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2021				
DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	February 22 - 25	40	\$1,995	Mount Pleasant, SC
Air Transport of Radioactive Materials (IATA/DOT)	February 26	8	\$985*	Mount Pleasant, SC
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DOT/NRC/EPA Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal	March 15 - 19	40	\$2,195	Salt Lake City, UT
Clive Disposal Site Facility Tour	March 18	--	\$0	Clive, UT
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DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	April 19 - 22	40	\$1,995	Surfside Beach, SC
Air Transport of Radioactive Materials (IATA/DOT)	April 23	8	\$985*	Surfside Beach, SC
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DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	June 7 - 10	40	\$1,995	Monterey, CA
Air Transport of Radioactive Materials (IATA/DOT)	June 11	8	\$985*	Monterey, CA
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DOT/NRC/EPA Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal	July 12 - 16	40	\$2,195	Clinton, TN
Bear Creek Operations (BCO) Facility Tour	July 15	--	\$0	Oak Ridge, TN
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DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	August 2 - 5	40	\$1,995	Orlando, FL
Air Transport of Radioactive Materials (IATA/DOT)	August 6	8	\$985*	Orlando, FL



* If an IATA class is taken in conjunction with the DOT/NRC class during the same week, there is a \$280 multi-class discount

** The American Academy of Health Physics (AAHP) has pre-approved continuation education credit hours for these courses