

## Teen Workers

It's that time of year when our teens will be looking for summer jobs. They may work to earn spending money, buy a car, save for college or gain work experience. They have the right to be safe and healthy at work and have a responsibility to be safe. Whatever the reason, plans for their job and for their future don't include getting hurt. And there are simple, practical steps that they and their employer can take to help make sure that their job helps build a better future.

### Employer Responsibilities:

- Provide a workplace that protects workers from injuries, illnesses and fatalities.
- Know the law about working limits for teens, including the number of hours they can work and the kinds of jobs that can be performed.
- Emphasize the importance of safety.
- Make sure that young workers are trained properly.
- Teach workers to recognize hazards and use safe work practices.

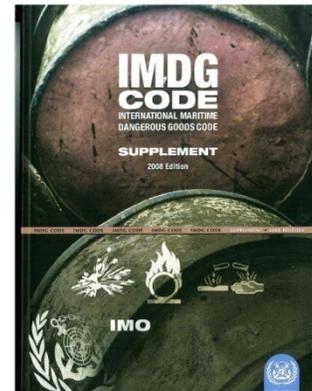
### Common workplace hazards and injuries

- Slips, trips and falls
- Strains and sprains
- Chemical exposure
- Burns and cuts
- Eye injuries
- Hearing loss
- Motor vehicle crashes
- Electrocuting
- Machinery malfunctions

### Teen Worker Responsibilities:

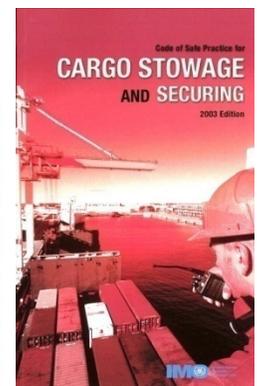
- Trust your instincts about dangerous situations.
- Follow all safety rules.
- Wear proper safety equipment.
- Ask questions about potentially dangerous situations or equipment.
- Tell your supervisor or parent if you suspect unsafe conditions.
- Be aware of your work environment.
- Work safely.
- Stay sober and drug-free.
- Know your workplace rights.

For more complete information go to U.S. Department of Labor  
[www.osha.gov/teens](http://www.osha.gov/teens)  
(800) 321-OSHA



## New Course Offering: IMDG Safe Transport of Radioactive Material by Sea

This course is for those that ship class 7 radioactive material internationally by vessel. The International Maritime Dangerous Goods Code and the additional requirements in 49 CFR are reinforced with practical application, industry events, shipping scenarios and lively discussion. Basic shipper functions are also reviewed and interwoven throughout this workshop. This IMDG class can be added to our basic or advanced refresher on-site class, or can be arranged as a separate 2-day shipping on-site class. Let us know how we can meet your training needs.



## Placarding Update

We talked to DOT again and they agree that they did not answer scenario # 4 in our letter of interpretation #10-0032 exactly the way they wanted to answer. What they meant to say in the last sentence of the answer on top of page 4 is that placarding would only be necessary on the vehicle if the cask is considered a non-bulk package and if it required a yellow-III label per 172.504 in table #1.



## New Rulings in the Federal Register

On **May 14, 2010**, The Pipeline and Hazardous Materials Safety Administration published a final rule that will incorporate longstanding special permits into the Hazardous Materials Regulations. These special permits have an established safety record as long as an equivalent level of safety is maintained. One special permit of interest is shipping pressurized gas filled tube or ion chamber radiation detectors. A new section (173.310) will include this special permit as an exception to the DOT specification pressurized cylinder requirements. The effective date is October 1, 2010, with voluntary compliance starting June 14, 2010. Included below is the new section.

### § 173.310 Exceptions for radiation detectors.

Radiation detectors, radiation sensors, electron tube devices, or ionization chambers, herein referred to as "radiation detectors," that contain only Division 2.2 gases, are excepted from the specification packaging in this subchapter and, except when transported by air, from labeling and placarding requirements of this subchapter when designed, packaged, and transported as follows:

- (a) Radiation detectors must be single-trip, hermetically sealed, welded metal inside containers that will not fragment upon impact.
- (b) Radiation detectors must not have a design pressure exceeding 4.83 MPa (700 psig) and a capacity exceeding 355 fluid ounces (641 cubic inches). They must be designed and fabricated with a burst pressure of not less than three times the design pressure if the radiation detector is equipped with a pressure relief device, and not less than four times the design pressure if the detector is not equipped with a pressure relief device.
- (c) Radiation detectors must be shipped in a strong outer packaging capable of withstanding a drop test of at least 1.2 meters (4 feet) without breakage of the radiation detector or rupture of the outer packaging. If the radiation detector is shipped as part of other equipment, the equipment must be packaged in strong outer packaging or the equipment itself must provide an equivalent level of protection.
- (d) Emergency response information accompanying each shipment and available from each emergency response telephone number for radiation detectors must identify those receptacles that are not fitted with a pressure relief device and provide appropriate guidance for exposure to fire.

On **March 18, 2010**, the Environmental Protection Agency (EPA) is taking Direct Final action on a number of technical changes that correct or clarify several parts of the Resource Conservation and Recovery Act (RCRA) hazardous waste regulations that relate to hazardous waste identification, manifesting, the hazardous waste generator requirements, standards for owners and operators of hazardous waste treatment, storage and disposal facilities, standards for the management of specific types of hazardous waste and specific types of hazardous waste management facilities, the land disposal restrictions program, and the hazardous waste permit program. These changes correct existing errors in the hazardous waste regulations that have occurred over time in numerous final rules published in the Federal Register, such as typographical errors, incorrect or outdated citations, and omissions. Some of the corrections are necessary to make conforming changes to all appropriate parts of the RCRA hazardous waste regulations for new rules that have since been promulgated. In addition, these changes clarify existing parts of the hazardous waste regulatory program and update references to Department of Transportation (DOT) regulations that have changed since the publication of various RCRA hazardous waste final rules. The effective date for this final rule is June 16, 2010.

**Recent Industry Issues**



Will this placard meet the required design specifications? Where does that yellow triangle really belong? Please watch out for the quality control of placarding manufacturers. These mistakes seem to be becoming more frequent!



Can you see the problem with the lid closure clips? Could the tie-downs have caused this? Be careful with any shipping container that could be "opened" by the downward pressure from the tie-downs.



How do you secure and cushion your hazardous materials inside a cardboard box to prevent shifting during transport? This box was only filled half way with packing peanuts.

## Frequently Asked Questions

Our topic this quarter is on shipping Instruments *or* Articles.

\* If I palletize and shrink wrap packages with the UN2911 marking on each, do I need to also mark the outside of the overpack with UN2911?

**Reference # 09-0235, 05-0174 and 05-0086**

No. Nice one word answer by DOT. You can add the additional marking on the overpack, but it is not required.

\* Can I ship a household smoke detector with the Am-241 source as non-regulated by DOT?

**Reference # 08-0144**

No, not if it meets the definition of a class 7 radioactive material.

\* Are tritium gun sights in commerce during routine security patrol?

**Reference # 07-0005**

No, these gun sights are not in hazardous material transportation if the guns are legally carried during the normal security guard duties, even on public or private roads.

\* Are tritium gun sights in commerce when security transports the sights in a case to another facility or a practice firing range?

**Reference # 07-0005**

Yes, if the tritium gun sight meets the definition of a class 7 radioactive material. This scenario, like shipping the gun sights back to the manufacturer or for repair, requires full compliance with the Hazardous Material Regulations since it is being transported as cargo.

\* Can I place the shipping paper in a pouch attached to the package for an excepted package of instruments that is also a hazardous substance?

**Reference # 05-0308**

Yes. The carrier will also need a copy to satisfy the accessibility requirements in 177.817.

\* Can I choose to fill out a shipping paper even when not required for an excepted package of instruments that does not meet the definition of a hazardous substance or hazardous waste?

**Reference # 05-0308**

Yes, the shipping document does not have to meet the shipping paper requirements in Part 172.

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To access any DOT letters of interpretation, go to: [www.phmsa.dot.gov/hazmat](http://www.phmsa.dot.gov/hazmat) Then, click on: "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 this internet address (and many more) in a Word document on our training class CD handout.

***The* MODERATOR is the official Training Services Newsletter for EnergySolutions  
This newsletter can also be viewed on our web site at [www.energysolutions.com](http://www.energysolutions.com)**

### 3rd Quarter Training Schedule

These transportation training courses meet the requirements of 49 CFR 172 Subpart H and NRC IE Notice 79-19				
Course	Date	Duration	Tuition	Location
DOT/NRC Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal	7/12 – 15	32 Hrs	\$1695	Oak Ridge, TN
DOT/NRC Basic Radioactive Waste Packaging, Transportation & Disposal	8/2 – 5	32 Hrs	\$1595	Orlando, FL
Air Transport of Radioactive Materials (IATA)	8/6	4 Hrs	\$595	Orlando, FL
Federal Motor Carrier Load Securing for Shippers	8/6	4 Hrs	\$395	Orlando, FL
<b>All courses meet both DOE and DOT requirements.</b>				
Hazardous Materials General Awareness Transportation	7/7	8 Hrs	\$480	Richland, WA
HAZMAT Drivers	7/8	4 Hrs	\$360	Richland, WA
Basic Hazardous Materials (Mod 1)	7/12 - 14	20 Hrs	\$745	Richland, WA
Basic Hazardous Waste (Mod 2)	7/14	4 Hrs	\$360	Richland, WA
Basic Radioactive Materials (Mod 3)	7/15 – 16	12 Hrs	\$600	Richland, WA
Advanced Mixed Waste	7/12 – 15	32 Hrs	\$1,110	Las Vegas, NV
Hazardous Materials General Awareness Transportation	7/14	8 Hrs	\$480	Richland, WA
Advanced Mixed Waste	7/19 – 22	32 Hrs	\$1,110	Richland, WA
IATA	7/27 – 29	24 Hrs	\$1,110	Las Vegas, NV
Hazardous Materials General Awareness Transportation	7/28	8 Hrs	\$480	Richland, WA
HAZMAT Drivers	7/29	4 Hrs	\$360	Richland, WA
Advanced Hazardous Waste	8/3 – 5	24 Hrs	\$990	Richland, WA
Basic Hazardous Materials (Mod 1)	8/9 – 11	20 Hrs	\$745	Las Vegas, NV
Basic Hazardous Waste (Mod 2)	8/11	4 Hrs	\$360	Las Vegas, NV
Basic Radioactive Materials (Mod 3)	8/12 -13	12 Hrs	\$600	Las Vegas, NV
Advanced Radioactive Material	8/10 - 12	24 Hrs	\$990	Richland, WA
HRCQ	8/17	4 Hrs	\$360	Richland, WA
HAZMAT Drivers	8/17	4 Hrs	\$360	Richland, WA
FMCSR for Drivers	8/18	8 Hrs	\$480	Richland, WA
Load Securement	8/19	8 Hrs	\$360	Richland, WA
FMCSR for Drivers	8/24	8 Hrs	\$480	Las Vegas, NV
Hazardous Materials General Awareness Transportation	8/25	8 Hrs	\$480	Las Vegas, NV
HAZMAT Drivers	8/26	4 Hrs	\$360	Las Vegas, NV
Hazardous Materials General Awareness Transportation	8/31	8 Hrs	\$480	Richland, WA
HAZMAT Drivers	9/1	4 Hrs	\$360	Richland, WA
Advanced Mixed Waste	9/13 – 16	32 Hrs	\$1,110	Richland, WA
FMCSR for Managers	9/14 – 15	16 Hrs	\$745	Richland, WA
Reasonable Suspicion	9/16	4 Hrs	\$360	Richland, WA
Highway Route Controlled Quantity	9/22	4 Hrs	\$360.00	Richland, WA

**New Schedule Lineup for 2011 NRC/DOT Classes** - Based on your feedback and popular demand we are bringing back the 3-Day Advance Refresher for Packaging, Transportation and Disposal of Radioactive Material/Waste. This class will be offered Tuesday thru Thursday in the following locations and dates:

Key West, Florida the week of January 10 – 14, 2011  
 Seattle, Washington the week of July 11 – 15, 2011  
 San Antonio, Texas the week of November 14 – 18, 2011

We will also include Load Securement for Shippers on Monday and IATA for Air Transport of Radioactive Materials on Friday during the same week. Come join us for one of our comprehensive and intensive refresher training workshops for experienced radioactive material shippers.