

Q4 2016 NEWS

LABELING AND PLACARDING CHANGES

Time to double check your supply of DOT shipping labels and placards to verify they meet the new and proposed changes. Below is a summary of the changes and recommended checks.

For <u>Labels</u> the revisions are located in 49 CFR 172.407:

(c) Size. (1) Each diamond (square-onpoint) label prescribed in this subpart must be at least 100 mm (3.9 inches) on each side with each side having a solid line inner border 5 mm inside and parallel to the edge. The 5 mm measurement is from the outside edge of the label to the outside of the solid line forming the inner border. [was "5.0 to 6.3 mm (0.2 to 0.25 inches)" for an allowed variance and did not specific where to take the *measurement before*] The width of the solid line forming the inner border must be at least 2 mm. [this is completely new, so measure your label's inner border to verify it is wide enough...see picture below...this changed in the January 08, 2015 (80 FR 1150-1151) federal reaister]

(i) If the size of the package so requires, the dimensions of the label and its features may be reduced provided the symbol and other elements of the label remain clearly visible. The solid line forming the inner border must remain 5 mm from the outside



edge of the label and the minimum width of the line must remain 2 mm.

(ii) Where dimensions are not specified, all features shall be in approximate proportion to those shown in §§ 172.411 through 172.448 of this subpart, as appropriate.

In the June 2, 2016 (81 FR 35540) final rule, DOT PHMSA added the following sentence **"However, the dotted or solid line outer border may also be used for backgrounds of contrasting color."** to 49 CFR 172. 172.406(d) Contrast with background.

In the September 7, 2016 (81 FR 61807) proposed rule, DOT PHMSA is asking for comments to revise the label size specification in 49 CFR 172.407(c)(1)(i) to say "If the size of the package so requires, the dimensions of the label and its features may be reduced proportionally [emphasis added to show what was added] provided the symbol and other elements of the label remain clearly visible." The last sentence about the exact size of line border(s) is proposed to be removed from 49 CFR 172.407(c)(1)(i) to allow the border to be reduced "proportionally" also. Another proposed change is to add an additional subsidiary placard for Uranium Hexafluoride shipments in 49 CFR 172.505(b). In addition to Radioactive and Corrosive placards, a Poison (Division 6.1) placard would also be required.

For <u>Placards</u> the revisions are located in 49 CFR 172.519:

(c) Size. (1) Each diamond (square-onpoint) placard prescribed in this subpart must measure at least 250 mm (9.84 inches) [was 273 mm (10.8 inches) and changed in the January 08, 2015 (80 FR 1151) federal register] on each side and must have a solid line inner border 12.5 mm [was 12.7 mm (0.5 inches)] inside and parallel to the edge. The 12.5 mm measurement is from the outside edge of the placard to the outside of the solid line forming the inner border.

There are transitional exceptions for both placards and labels. The first exception is for placards and labels in conformance with the 49 CFR requirements in effect on December 31, 2014, may continue to be used until December 31, 2016. The second exception is for domestic transportation only, a placard and/or label manufactured prior to January 1, 2017 in conformance with the 49 CFR requirements in effect on December 31, 2014, may continue in service until the end of its useful life provided the color tolerances are maintained and are in accordance with the display requirements in 49 CFR.

IMDG UPDATES LABEL, MARKINGS GUIDE

The International Maritime Organization (IMO) has updated their full-color wall chart, which illustrates the labels, marks and signs required under The International Convention for the Safety of Life at Sea (SOLAS) and detailed in the International Maritime Dangerous Goods (IMDG) Code. This edition includes a new Class 9 label for lithium batteries and associated lithium battery mark.



IG223E - Wall chart: IMDG Code Labels, Marks & Signs, 2016, copied from IMO Publishing Product Details website on September 27, 2016



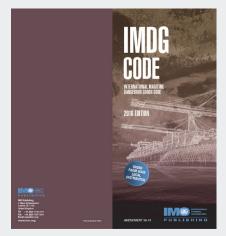
IMDG CODE AMENDMENT 38-16 NOW AVAILABLE

ENERGYSOLUTIONS

Commercial Training Services

The International Maritime Organization (IMO) has published the 2016 edition of the International Maritime Dangerous Goods (IMDG) Code. This new volume "Amendment 38-16" of the IMDG Code is mandatory as from January 1, 2018 and in force for 2 years, but may be applied in whole or in part on a voluntary basis starting January 1, 2017. The current 2014 edition of the IMDG Code Supplement remains valid. Visit IMO's publication webpage for more details and list of

significant changes at http://www.imo.org/ en/Publications/IMDGCode/Pages/Default. aspx





IATA DGR 2017 EDITION REVISIONS

The 58th edition of the International Air Transport Association (IATA) Dangerous Goods Regulations (DGR) is now available. Some notable changes include: Added adequate Lithium Battery Training requirements in Section 1.6; FedEx revised their operator variations; all uranium hexafluoride shipments now include Poisonous Material (for UN2977 & UN2978 Division 6.1 is a subsidiary risk in addition to Class 8, and for UN 3507 Division 6.1 is the primary hazard with subsidiary risks of Class 7 & 8, plus the packing instruction assigned is now PI 603); Added a new note in Section 10.5.14.1.1 to ensure all types of radiation are used to determine the transport index (TI); Where packages are placed in

an overpack, the Class 7 label type and the Transport Index of the overpack must also be provided on the Shipper's Declaration; and the title and place of the signatory on the Shipper's Declaration is no longer mandatory, but may still be provided. Visit IATA's dangerous goods documentation webpage for more details and list of signifi-

cant changes at http://www.iata.org/what-

wedo/cargo/dgr/Pages/download.aspx IATA also added a new Appendix H to request your comment on a new approach to accomplish training based on competency and job function instead of a person's job title. Please submit comments by March 31, 2017. For more information, please visit the International Civil Aviation Organization's (ICAO) New Training Provisions for the Safe Transport of Dangerous Goods by Air website : http://www.icao.int/safety/

dangerousgoods/pages/newtrainingprovi-

sions0630-4506.aspx

NRC UPDATED DESIGNEE LIST

The Nuclear Regulatory Commission (NRC) has recently updated the list of individuals to receive advance notification of radioactive material and nuclear material shipments required by either 10 CFR Part 37, Part 71 or Part 73. This list of States, Territories and Participating Tribes can be downloaded from the NRC website at

https://scp.nrc.gov/special/designee.pdf

JANUARY 23–24, 2017 ADVANCED NRC/DOT RADIOACTIVE WASTE SHIPPER

Course Duration: 16 hours | Retrain Frequency: 3 years

This 2-day review course is ideal for experienced radioactive waste shippers who requiring a quick regulation refresher, learn about recent regulatory or industry issues, and get recertified. This course is being held in conjunction with the upcoming Energy*Solutions'* Annual Conference held in Salt Lake City, Utah, on January 25 – 26, 2017. The conference includes a tour of Energy*Solutions'* Clive disposal site, presentations, and panel disccusions. Attending both the conference and refresher training back-to-back provides the ultimate in industry updates.

Register for this Course

https://www.energysolutionstraining.com/classes/ session-details/advanced-2-day-review-seminar-inassociation-with-the-2017-customer-conferenceregistration-after-10-31-16-jan-23-2017-2

Register for Conference http://www.energysolutions.com





THE LATEST HAPPENINGS

FMCSA CORRECTS JULY 22, 2016 FI-

NAL RULE: On September 02, 2016 (81 FR 60633), the Federal Motor Carrier Safety Administration (FMCSA) published a final rule to make corrections to the July 22, 2016 (81 FR 47722) final rule regarding amendments to the Federal Motor Carrier Safety Regulations (FMCSRs) in response to several petitions for rulemaking and NTSB recommendations. FMCSA makes several minor clerical corrections regarding the rear license plate lamp requirements and the periodic inspection requirements for antilock brake systems (ABS) in 49 CFR Parts 393 & 396 and Appendix G to Subchapter B of Chapter III. The corrections in this final rule are effective September 2, 2016.

DOT INTERNATIONAL HARMONIZATION

COMMENT REQUEST: On September 07, 2016 (81 FR 61741), the Pipeline and Hazardous Materials Safety Administration (PHMSA) published a notice of proposed rulemaking (NPRM) to amend the Hazardous Materials Regulations (HMR) in 49 CFR Parts 107 - 180 to maintain consistency with international regulations and standards by incorporating various amendments, including changes to proper shipping names, hazard classes, packing groups, special provisions, packaging authorizations, air transport quantity limitations, and vessel stowage requirements. These revisions are necessary to harmonize the HMR with recent changes made to the International Maritime Dangerous Goods (IMDG) Code, the International Civil Aviation Organization's (ICAO) Technical Instructions for the Safe Transport of Dangerous Goods by Air, and the United Nations Recommendations on the Transport of Dangerous Goods - Model Regulations. Additionally, PHMSA proposes several amendments to the HMR that result from coordination with Canada under the U.S.-Canada Regulatory Cooperation Council. Please comment by November 7, 2016.

DOT REQUESTS 2018 IAEA REVISION

COMMENTS: On September 13, 2016 (81 FR 62972), the PHMSA published a notice to request public input to assist in U.S. comment development on a draft revision of the International Atomic Energy Agency's (IAEA) "Regulations for the Safe Transport of Radioactive Material" (SSR–6), which is scheduled for publication in 2018. Both the PHMSA and the U.S. Nuclear Regulatory Commission (NRC) will submit comments jointly to the IAEA regarding the draft document. Comments must be received on or before October 28, 2016.



DOE FUTURE NUCLEAR WASTE SITE COM-MENT REQUEST: On September 15, 2016 (81 FR 63475), the Fuel Cycle Technologies, Office of Nuclear Energy, Department of Energy (DOE) published a notice to continue requesting public comment on designing a consent-based siting process establishing an integrated waste management system to transport, store, and dispose of commercial spent nuclear fuel and high-level defense radioactive waste. In a consent-based siting approach, DOE will work with communities, tribal governments and states across the country that express interest in hosting any of the facilities identified as part of an integrated waste management system. As part of this process, DOE issued an Invitation for Public Comment in the Federal Register (80 FR 79872) on December 23, 2015 and hosted eight public meetings across the United States in 2016 to seek input on the elements that should be considered in the development of a consent-based siting process. Comments must be received on or before October 30, 2016 to be considered in the final report.

NRC UPDATES NUREG-1556: On September 19, 2016 (81 FR 64207), the Nuclear Regulatory Commission (NRC) published a notice about issuance of updates to NUREG-1556 (Consolidated Guidance About Materials Licenses), Volumes 1 (Portable Gauges), 2 (Industrial Radiography), 3 (Sealed Sources and Devices), 4 (Fixed Gauges), 10 (Master Material Licenses), 15 (Changes of Control and Bankruptcy), and 19 (Reciprocity). These documents have been updated to include information on updated regulatory requirements, safety culture, security of radioactive materials, protection of sensitive information, and changes in regulatory policies and practices.

NRC REQUEST COMMENTS ON

NUREG-5051: On September 21, 2016 (81 FR 64955), the NRC published a notice issuing for public comment Draft Regulatory Guide (DG) DG–5051, "Shipping, Receiving, and Internal Transfer of Special Nuclear Material." This DG would consolidate in one document NRC guidance concerning the material control and accounting requirements pertaining to shipments, receipts, and internal transfers of special nuclear material. Please

IN THE FEDERAL REGISTER

submit comments by October 21, 2016. Although a time limit is given, comments and suggestions in connection with items for inclusion in guides currently being developed or improvements in all published guides are encouraged at any time.

DOT ISSUES LITHIUM BATTERY SAFETY

WARNING: On September 22, 2016 (81 FR 65463), the PHMSA published a safety advisory notice to inform the public of the risks associated with transporting damaged, defective, or recalled lithium cells or batteries or portable electronic devices (PEDs), including Samsung Galaxy Note 7 smartphone devices recently recalled by the U.S. Consumer Product Safety Commission's (CPSC) [Recall No. 16-266]. Anyone wishing to carry a Samsung Galaxy Note 7 subject to CPSC Recall no. 16-266 aboard aircraft must take all of the following precautions:

- Turn off the device;
- Disconnect the device from any charging equipment;
- Disable all applications that could inadvertently activate the phone (e.g., alarm clock);
- Protect the power switch to preven its unintentional activation; and
- Keep the device in carry-on baggage or on your person. (Do not place in checked baggage.)

DOT LITHIUM BATTERY SAFETY NOTICE:

On September 22, 2016 (81 FR 65463), the Federal Aviation Administration (FAA) published a safety notice to inform the public of Emergency Restriction/Prohibition Order No. FAA–2016–9156 issued on September 16, 2016 to Braille Battery, Inc. prohibiting Braille Battery from offering for transportation and transporting, any lithium ion battery that is not in compliance with the Hazardous Materials Regulations (HMR) (49 CFR Parts 171 - 180) or the International Civil Aviation Organization (ICAO) Technical Instructions as permitted in the HMR. The Emergency Restriction/Prohibition Order was effective on September 16, 2016.

FMCSA CORRECTS 49 CFR PARTS 355-

398: On October 04, 2016 (81 FR 68336), the FMCSA published a final rule to amend its regulations in 49 CFR Parts 355 thru 398 by making technical corrections throughout. FMCSA is making minor changes to correct errors and omissions, ensure conformity with Office of the Federal Register style guidelines, update cross references, and improve clarity and consistency of certain



regulatory provisions. Further, this set of amendments removes all remaining instances of the term "common carrier" and "contract carrier" as required by the ICC Termination Act (ICCTA) and the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA–LU). This rule does not make any substantive changes to the affected regulations, except to remove obsolete provisions. This final rule is effective on September 30, 2016 to ensure changes are incorporated into the October 1, 2016 annual edition of Title 49.

FMCSA REQUESTS SMS COMMENTS: On

October 05, 2016 (81 FR 69185), the FMCSA published a notice requesting public comment on future enhancements to the Safety Measurement System (SMS). FMCSA proposes enhancements to information on the public SMS Web site and responds to comments received in response to FMCSA's Federal Register Notice, "Proposal for Future Enhancements to the Motor Carrier Safety Measurement System (SMS)," published on June 29, 2015 (80 FR 37037). The proposed enhancements will be available for preview, at: https://csa.fmcsa.dot.gov/SMSPreview/ on October 4, 2016. FMCSA seeks comments on these changes based on the preview Comments must be received by December 3, 2016.

NRC REVISES RG 5.12 USE OF LOCKS: On October 05, 2016 (81 FR 69088), the NRC published a notice about issuing Revision 1 to Regulatory Guide (RG) 5.12, "General Use of Locks in Protection and Control of: Facilities Radioactive Materials, Classified Information, Classified Matter, and Safeguards Information." This RG describes methods and procedures that the staff of the NRC considers acceptable for the selection, use, and control of locking devices in the protection of areas, facilities, certain radioactive materials, and specific types of information (e.g. classified matter, National Security Information (NSI), Restricted Data (RD), Formerly Restricted Data (FRD), Safeguards Information (SGI)). The revised scope of the guide now includes control and protection of: (1) Classified information/matter, (2) safeguards information, (3) an aggregated Category 1 or Category 2 quantity of radioactive material listed in 10 CFR Part 37 Appendix A, and (4) spent nuclear fuel. Revision 1 to RG 5.12 will be available after October 5, 2016.

FAA SAFETY CONCERNING SAMSUNG

NOTE 7 PHONES: On October 19, 2016 (81 FR 71983), the FAA published a safety notice concerning Emergency Restriction/Prohibition Order No. FAA-2016-9288 issued on October 14, 2016 and effective October 15, 2016 to Samsung Galaxy Note 7 users and air carriers prohibiting persons from offering for air transportation or transporting via air any Samsung Galaxy Note 7 device on their person, in carry-on baggage, in checked baggage, or as cargo.

NRC REVISES RG 5.51 MATERIAL CON-

TROL AND ACCOUNTING: On October 26, 2016 (81 FR 74484), the NRC published a notice about issuing Revision 1 to Regulatory Guide (RG) 5.51 "Independent Assessment of Nuclear Material Control and Accounting Systems." Revision 1 is based on experience gained since RG 5.51 was initially published in June 1975, and reflects revisions to the NRC's material control & accounting (MC&A) regulations that have been made since 1975. Revision 1 to RG 5.51 is available on October 26, 2016.

NRC PLANS TO UPDATE 10 CFR PART 71:

On November 21, 2016 (81 FR 83171), the NRC published a notice about considering a potential amendment to its regulations that would revise 10 CFR Part 71 on packaging and transporting radioactive material to ensure compatiblity with both the 2102 edition and the draft 2018 edition of the IAEA SSR-6 regulations. The NRC is asking the public to comment of the following issues: Aging; Definitions; Fissile Materials; Low Specific Activity (LSA-III); NRC-Identified Changes; Reduced External Pressure Requirement for Type A Package Test; Solar Insolation; Surface Contaminated Object (SCO-III); Transitional Arrangements; Type C Package; and Uranium Hexafluoride (UF6) Package. These issues are discussed in greater detail in the issues paper that will be posted at http://www.regulations.gov/docket?D=NRC-2016-0179. The NRC has also identified additional potential issues for incorporation in the rulemaking action that are also discussed in the issues paper (i.e., changes related to harmonization with DOT regulations and include administrative, editorial, or clarification matters). Please submit comments by January 20, 2017.

DOT REQUESTS COMMENTS ON CAR-

GO TANKS: On November 21, 2016 (81 FR 83190), the PHMSA published an advance notice of proposed rulemaking (ANPRM) to solicit public comment on two (2) petitions to amend the Hazardous Materials Regulations (HMR) in 49 CFR Parts 171–180 applicable to the marking of cargo tanks transporting petroleum distillates. Please submit comments by February 21, 2017.

DOT ISSUES RAIL SAFETY ADVISORY: On

November 28, 2016 (81 FR 85674), the Federal Railroad Administration (FRA) published a notice about issuing Safety Advisory 2016-02 out of concern for the number of railroad and railroad contractor fatalities that occur when roadway workers perform certain activities that fall outside the scope of FRA's safety regulations, but within the purview of the U.S. Occupational Safety and Health Administration's (OSHA) regulations. FRA is issuing this Safety Advisory to remind railroads and railroad contractors, and their employees (including roadway workers) of the importance of identifying hazardous conditions at job locations, conducting thorough job safety briefings to discuss the hazardous conditions, and taking appropriate actions to mitigate those conditions.

EPA UPDATES RCRA GENERATOR STAN-

DARDS: On November 28, 2016 (81 FR 85732), the Environmental Protection Agency (EPA) published a final rule to complete the Resource Conservation and Recovery Act's (RCRA) hazardous waste generator regulatory program revisions in 40 CFR Parts 257 - 279 proposed on September 25, 2015 (80 FR 57918). The objective of these changes include reorganizing the hazardous waste generator regulations to make them more userfriendly and thus improve their usability by the regulated community; providing a better understanding of how the RCRA hazardous waste generator regulatory program works; addressing gaps in the existing regulations to strengthen environmental protection; providing greater flexibility for hazardous waste generators to manage their hazardous waste in a cost-effective and protective manner; and making technical corrections and conforming changes to address inadvertent errors and remove obsolete references to programs that no longer exist. This final rule is effective on May 30, 2017.

EPA HAZARDOUS WASTE EXPORT-IM-

PORT REVISIONS: On November 28, 2016 (81 FR 85696), the EPA published a final rule amending its regulations in 40 CFR Parts 260 - 273 regarding the export and import of hazardous wastes from and into the United States. EPA is making these changes to: Provide greater protection to human health and the environment by making existing export and import related requirements more consistent with the current import and export requirements for shipments between members of the Organization for Economic Cooperation and Development (OECD); enable electronic submittal to EPA of all export and import-related documents (e.g., export notices, export annual reports); and enable electronic validation of consent in the Automated Export System (AES) for export shipments subject to RCRA export consent requirements prior to exit. This final rule is effective on December 31, 2016.



FAQS Waste Packaging Exeptions 49 CFR 173.12(c)

Do the exceptions in 173.12(c) only apply to bulk packagings? Reference # 05-0226

Yes, the reconditioning and reuse exceptions in 173.12(c) are for non-bulk packagings only. Bulk packagings will still need to meet the packaging requirements in Part 173.

Are the exceptions in 173.12(c) for any "waste material" and/or EPA hazardous waste? Reference # 05-0235R

These packaging exceptions are for any type of waste-like or spent material, not just hazardous waste as defined in 49 CFR 171.8.

The reuse exception in 173.12(c) states the package is not subject to Part 178, but 173.22(a)(4) states a shipper must bring a package into compliance with Part 178. Which is correct? Reference # 03-0266; 10-0242 & 13-0008

173.12(c) only excepts the package from the "reconditioning and reuse" requirements in Part 178 (i.e. the special reconditioning package marking requirements), so a shipper will still need to comply with all other Part 178 requirements like closure instructions.

Are there any hazard classes that would not be allowed under the exception in 49 CFR 173.12 for hazardous waste? Reference # 13-0008

No. A waste material in any hazard class may be transported for disposal or recovery under the exceptions provided in 49 CFR 173.12.

To access any DOT letters of interpretation, go to: 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.

popquiz



Can you say "oversize load"!?! The over height package in this picture is actually touching the traffic lights. Speaking of over height vehicles, please search for "11Foot8 Bridge Crashes" on YouTube if you have not seen these videos reinforcing the need for proper shipment planning for any oversize loads.



Can you identify at least three things wrona with this shipment? Does the gross mass marking meet the minimum height requirement of 50mm (2in) for this bulk packaging as outlined in 49 CFR 172.302(b)(3)? Also, how many lineouts are allowed on any package marking? Hopefully you answered none. The legibility requirements can be found in 49 CFR 172.304. The third issue may be a little harder to see in this picture, should the radioactive label and/ or placard have an outer border if placed on a same color background? Yes, an outer border is required anytime labels [49 CFR 172.406(d)] or placards [49 CFR 172.516(c)(7)] are placed on a non-contrasting background.



How many issues can you identify with these

placards? First, even with international shipments, are the letters "UN" allowed to be placed with the ID# on a Radioactive placard? The answer is "no" since in Section 544 of the IAEA SSR-6 it states to only display the "digits" of the ID# on the Radioactive placard. Only package markings, does the IAEA SSR-6 mention the UN marking to require the letters "UN" in Table 9. DOT does allow the use of the IAEA rules for export and import shipments in 49 CFR 172.519(f). Second, should the Corrosive placard obscure the Radioactive placard on the trailer in any way? "No" is the answer again per 49 CFR 172.516.



2017 COMMERCIAL TRAINING SCHEDULE

DOT/NRC 4-Day Radioactive Waste Packaging, Transportation & Disposal (NRC 79-19) with IATA/DOT Air Transport of Radioactive Materials (1-Day) Training, *and* DOT/NRC/EPA 4-Day Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal Training

COURSE DATE CEU** TUITION LOCATION Advanced DOT/NRC Radioactive Waste Packaging, Transportation & Disposal Jan. 23 – 24 \$1195 Salt Lake City, UT --\$0 Salt Lake City, UT **Clive Disposal Site Facility Tour** Jan. 25 --\$O Energy Solutions Annual Customer Conference Jan. 26 Salt Lake City, UT ___ Customer Portal, Clive WAC, and Cask Leak Test Troubleshooting Jan. 27 \$O Salt Lake City, UT ___ DOT/NRC/EPA Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal Feb. 6 – 10 32 \$1895 Oak Ridge, TN Bear Creek Operations (BCO) Facility Tour Feb. 9 --\$O Oak Ridge, TN Feb. 27 – Mar. 2 DOT/NRC Radioactive Waste Packaging, Transportation & Disposal 32 \$1795 San Diego, CA Air Transport of Radioactive Materials (IATA/DOT)* Mar. 3 8 \$945 San Diego, CA DOT/NRC Radioactive Waste Packaging, Transportation & Disposal Apr. 24 – 27 32 Surfside Beach, SC \$1795 8 Air Transport of Radioactive Materials (IATA/DOT)* Apr. 28 \$945 Surfside Beach, SC DOT/NRC/EPA Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal May 15 – 19 32 \$1895 Salt Lake City, UT \$O Clive, UT **Clive Disposal Site Facility Tour** May 18 --DOT/NRC Radioactive Waste Packaging, Transportation & Disposal Jun. 5 – 8 32 \$1795 Mount Pleasant, SC Air Transport of Radioactive Materials (IATA/DOT)* Jun. 9 8 \$945 Mount Pleasant, SC DOT/NRC Radioactive Waste Packaging, Transportation & Disposal Orlando, FL Jul. 31 – Aug. 3 32 \$1795 Air Transport of Radioactive Materials (IATA/DOT)* 8 Orlando, FL Aug. 4 \$945 DOT/NRC/EPA Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal Sep. 11 – 15 32 \$1895 Columbia, SC Barnwell Disposal Site & Processing Facilities Tour Sep. 14 ---\$0 Barnwell, SC DOT/NRC Radioactive Waste Packaging, Transportation & Disposal Oct. 23 – 26 32 \$1795 Hilton Head, SC Air Transport of Radioactive Materials (IATA/DOT)* 8 \$945 Hilton Head, SC Oct. 27 DOT/NRC Radioactive Waste Packaging, Transportation & Disposal Dec. 4 – 7 32 \$1795 Las Vegas, NV 8 Air Transport of Radioactive Materials (IATA/DOT)* Dec. 8 \$945 Las Vegas, NV

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

IATA*: If an IATA class is taken in conjunction with the basic class during the same week, there is a \$200 multi-class discount

CEU**: The American Academy of Health Physics (AAHP) has awarded continuation education credit hours for these courses