

# Environmental Compliance & Transportation Information Bulletin



Edition 62.

March 2008

## Editor's Corner

*Well, as I write this newsletter, tomorrow is the first day of spring. A time for new beginnings. As many of you may know by now, I started a new job. I am still at the CX, but I am now the Director of the Environmental and Munitions Center of Expertise in Omaha. I am thrilled with the promotion and all the opportunities that lie ahead. I hope I can continue to work with all the districts and all the divisions and really serve the community of practice in years to come.*

*As far as the future of this newsletter, as much as I love writing it, I am unsure I will be able to continue. After writing this newsletter for over 15 years, I may find I have to reassign the writing in the future. But I will let you know.*

*As always, I am just a phone call away, so if you need me or the CX, do not hesitate to call! You know where to find me!*

*Very sincerely,*

*Sandi Zebrowski*

## Upcoming training sessions

Our surveyed initial manifest course was completed just last week in Atlanta. We had a great turn out, 27 students in the initial course. We also ran the recertification course as well with a great turn out of 24 students.



At the present time, we have no additional manifest courses currently scheduled for this FY, but I am sure on-sites will come up, so if you need initial or recertification training in FY08, call Rick Waples and he will let you know what is available.

## FY09 PROSPECT Survey to be out soon



Usually in April the USACE training survey comes out for the next FY. If you are a Corps employee or a federal employee from another agency, you can register for a PROSPECT course during this timeframe. We encourage you to sign up at the survey time. You do not have to pay yet, just register so that the course will not be cancelled. You can register anytime, but at survey time really helps us out. If for some reason you cannot attend, when the registration notice is sent out, then you simply do not register, or pay.

When the FY09 PROSPECT Course manual, The Purple Book, becomes available, you will find it at: <http://pdsc.usace.army.mil/Default.aspx>

Remember, this training is open to *all federal employees* and everyone can and should register when FY08 registration opens!

Courses are listed in the manual as follows:

- HW Manifest/DOT Certification, Course 223. This is the Initial Hazardous Waste Manifesting and DOT Certification Course (36-hours). It is DOT and ISEERB approved.
- HW Recertification Course (16-hours), Course 429. This is the 2-day recertification course for hazardous waste.
- RW/DOT Certification, Course 441. This is the Initial Radioactive Waste Transportation course (24 hours).
- Rad Waste Transport/DOT Recert, Course 430. This is the Hazardous & Radioactive Waste Recertification Course (20 hours).

As always, to schedule an onsite for initial training or refresher training, or to obtain additional information, contact: Joe Pickett, (256) 895-7445, Rich Waples, (402) 697-2560, e-mail: [Richard.J.Waples@usace.army.mil](mailto:Richard.J.Waples@usace.army.mil) or Beverly VanCleaf at (402) 697-2559, e-mail: [Beverly.D.Vancleaf@usace.army.mil](mailto:Beverly.D.Vancleaf@usace.army.mil).

## Tritium Exit Signs Present a Challenge in Handling and Disposal

*Note: This was sent to me via email.*

Exit signs pointing the way out of buildings and airplanes probably have saved many lives during emergencies since being required by state laws in the 1930s. However, exit signs require proper handling and disposal to protect public health and the environment, especially those containing the radioactive material tritium. While the benefit of tritium exit signs is that they glow even when they have no electrical power or batteries, they also must be isolated from other wastes during disposal, since they may and often do contaminate scrap metal from demolition sites. For this reason, tritium exit signs are regulated by the Nuclear Regulatory Commission, and proper disposal of the signs is required once they are no longer used.



While many large commercial and government entities are aware of the requirements for use and disposal, many small businesses are unaware of the NRC requirements, leading to the improper disposal of tritium exit signs in industrial or municipal landfills, or worse, their being sold over the Internet.

Tritium Could Cause Both Health Risks and Economic Costs and Liabilities Should a tritium exit sign – which contains tritium-filled glass tubes – break, its contents could pose a risk to those located in the near vicinity. They could be exposed to tritium gas or tritiated water from the tritium that has escaped into the environment.

Cleaning up tritium after an accident could be costly, especially for small businesses. Worker or public exposure to tritium also could present unwanted and unnecessary liabilities. In addition, tritium may leak from landfills where sign have been illegally disposed, and could compromise the safety of drinking water sources.

EPA Responds to Concerns about Mismanagement of Tritium Exit Signs EPA has developed an on-line training course providing detailed instructions on best practices for the handling and disposal of tritium exit signs in response to the lack of awareness on the part of facility owners, management, and maintenance personnel. The course contains easy-to-follow, step-by-step guidelines on using and disposing of tritium exit signs, as well as the rationale for why proper use and disposal is so important. To access the training online, go to [www.trainex.org](http://www.trainex.org) and search for “Tritium Exit Signs, responsible management.”

EPA is currently conducting outreach among targeted audiences to increase awareness about the problems associated with tritium exit signs and the advantages of proper training on the proper use and disposal of tritium exit signs. EPA is encouraging, where appropriate, the use of alternative technologies. The targeted audience for the training includes state and local officials; school facility managers; operators of public places including hotels, malls, dorms, and theaters; and green building designers.

## Transportation of Lithium Batteries

The EM CX has prepared a Fact Sheet to address compliance issues associated with the transportation of lithium batteries, lithium batteries packed with equipment and lithium batteries contained in equipment. This fact sheet focuses primarily on the Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations but also discusses the current and pending International Civilian Aviation Organization (ICAO) and International Air Transportation Association (IATA) Dangerous Goods Regulations (DGR). This entire fact sheet can be found at FS 08-01 at <http://www.environmental.usace.army.mil/complyfs.htm>



In summary, consumer electronic devices continue to be provided an exemption under PHMSA regulations and ICAO technical instructions provided they meet the definition of a small battery and spare batteries are properly secured and carried in **carry-on-baggage only**. The limitation is 2 lithium ion batteries not to exceed a total of 25 grams ELC (160 Whr).

*Lithium metal batteries* are generally *forbidden* on passenger aircraft *unless* they meet the carry-on provisions of domestic and international provisions (i.e. small cell/battery) *or the marking, documentation, and limitations provided by SP 188, 189, and/or 190.*

Beginning January 1, 2009, ICAO Technical Instructions will be adding additional PSNs for lithium battery entries clarifying the distinction between lithium metal and lithium ion batteries.

For the PSNs *Lithium batteries contained in equipment, Lithium batteries, packed with equipment* and *Lithium battery* that are used to describe **Lithium ion battery** scenarios and are not covered by carry-on provisions; the lading is subject to hazardous materials regulations unless the cell/battery does not meet the definition of a Class 9 material (i.e. < 1.5 grams ELC/cell [20 Whr]; < 8 gram ELC/battery [100 Whr]). Effective January 1, 2009 additional communication requirements (labeling, documentation, and training) will be applicable to small, excepted batteries.

## Regulatory Update

Note that this update just provides registers of interest pertaining to the management and transportation of hazardous materials and hazardous wastes. See our web site for a more complete listing of EPA Federal Registers that impact all Corps environmental work:

[http://www.environmental.usace.army.mil/info/technical/compliance\\_tools/comptools/comptools.html](http://www.environmental.usace.army.mil/info/technical/compliance_tools/comptools/comptools.html)



The entire register can be assessed at <http://www.gpoaccess.gov/fr/index.html>

### 02/08/2008 p 7628 – 7629 Proposed Recommended Practices for Bulk Loading and Unloading of Hazardous Materials in Transportation

**Action:** Notice; request for comments.

**Summary:** PHMSA has extended the comment period to 3/14/2008 for the original 01/04/2008 notice. In that notice, PHMSA summarizing incident data related to bulk loading and unloading operations, presented their perspective on existing regulatory controls and summarized proposed recommended practices for loading and unloading based on a June 14, 2007 public workshop with stakeholders. PHMSA further requested comments on whether there are existing gaps and/or overlaps in regulations promulgated by PHMSA, OSHA, EPA, and the USCG that could adversely affect the safety of the subject operations.

**Applicability:** Hazmat employees involved with bulk loading and unloading operations should be aware of existing incident data and potential future PHMSA rulemaking. Comments are due 3/14/2008.

**Reference:** [http://www.access.gpo.gov/su\\_docs/fedreg/a080208c.html](http://www.access.gpo.gov/su_docs/fedreg/a080208c.html)

### 02/26/2008 p 10204 - p 10210 Hazardous Waste Management System; Modification of the Hazardous Waste Manifest System

**Action:** Notice of data availability and request for comment.

**Summary:** Finalization of the electronic Manifest Rule is contingent upon enactment of legislation which would provide EPA authority to collect user-fees to fund the development and operation of a centralized system. However, EPA continues moving forward and requests comments on their preferred approach. EPA is considering a system which would capture information from both electronic and paper versions of manifests by requiring designated facilities to submit the information from paper manifests to the e-Manifest system operator. This notice also responds to concerns raised regarding whether manifest information is Confidential Business Information (CBI). Comments are due by April 11, 2008.

**Applicability:** This applies to manifesting of hazardous waste. There are potential cost and procedural impacts to generators and TSD facilities using either paper or electronic versions of the manifest.

**Reference:** [http://www.access.gpo.gov/su\\_docs/fedreg/a080226c.html](http://www.access.gpo.gov/su_docs/fedreg/a080226c.html)

**Question of the Quarter?** If April showers bring May flowers, what do May flowers bring?



(The Pilgrims!) My 6 year old told me that one!

**Do you have a regulatory question?** Call us or e-mail us at [http://www.environmental.usace.army.mil/tech\\_reg.htm](http://www.environmental.usace.army.mil/tech_reg.htm)



*Happy Spring!*



**EC&T Information Bulletin**

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Hazardous, Toxic & Radioactive Waste Center of Expertise in Omaha, NE.**

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