

Somebody pointed out to me that they tried to download my handout and it came up with the fact that the file was damaged. It is not damaged. You have to have Adobe Reader 6. If you have anything earlier than Adobe Reader 6 it will not work. So if you're downloading my handout, be sure you go and update your reader to Adobe Reader 6 and it will work. Okay. Some questions have come up as to how applicable are these transportation regulations and moving some... a radioactive material package from this side of the street to the other side of the street. Alright. If you take and you carry that package, you are beyond the regulations. If you put that package into your car, vehicle, motor vehicle and drive across the street. You are subject to these regulations. Does that answer that question. Yes sir. Audience: A couple years ago I had to drive to a dump in

Ohio, to take out radioactive urine and blood samples, and I had to bring them back. So I used my (inaudible). Was I in violation. Speaker: No, but you probably didn't package it correctly. But, who cares. Audience: So I set the separate... Speaker: Yeah... Audience: pieces in separate places (inaudible). Speaker: Yeah, okay, and also somebody else was commenting that the car insurance, your car insurance, vehicle insurance, may prohibit you from such items. I don't think so in general, for this reason; that if you look on your homeowners policy, if you look on your motor vehicle policy, this is information aside from, I guess really what I'm talking about today, but there seems to be an exclusion, but if what is happening here is... I don't know how many of you people are familiar with the Price-Anderson Indemnification Act. The Price-Anderson Indemnification Act was

an Act passed by Congress many years ago, that says that if there is a nuclear reactor catastrophe somewhere, that there is not enough private insurance coverage to adequately cover such a disaster like that. So they priced the, they basically put the federal government into the insurance business for a nuclear medicine, and down the nuclear... and a nuclear reactor type of incident and what you're reading is... you gotta read it very carefully is, that what this... your homeowners policy and your car insurance policy is basically saying, this does not apply for a nuclear reactor fiasco because Price-Anderson does. So if you look at it carefully, I think it's something, which you will find, but in general, whatever... Yes sir. Audience: I was in transport, iodine seams for a processing plant to another facility that's on your license... Speaker: Say what now. Audience: But

if you transport iodine 25 seams, in the packaging that it was sent to the hospital and that... to another facility that's on your license... Speaker: Being on your license has nothin to do with transportation. Audience: Alright. Speaker: As long as it's, it's the same thing as I gave before. If you're carrying it as a pedestrian, fine. If you're putting it in a motor vehicle as a driver, you're subject to it. On the street. Audience: But if you drive it and there's no one driving (inaudible). Speaker: Pardon. Audience: But if condition driving (inaudible). Speaker: No. It's not one. The... in terms of the driving requirements and stuff, I, I, I'm just going to come to carry in just a few minutes so hang on to that one. I have also been told I have mi; I missed some hands in the back from time to time. You think I'm looking at you. If I don't see your hand, I am not bashful, as

you people can tell Just yell at me and your not gonna hurt my feelings and so somebody down here is about to yell at me Yeah Audience: If the transportation is on the same campus, but different buildings isn't, isn't that... As long as your on the same campus that your, your not in violation if you move to just one building to another Speaker: Not necessarily It all depends upon... is tha, is your, is your campus a private road or not Audience: Yes Speaker: That's what you have to determine You understand On a campus, where your transporting it from building A to building B on a campus and that all depends upon the roadways there Some campuses, they are totally private roads, the others are not So you, tha, tha, that's what that depends upon Okay

What we have up here is placarding Placarding is very easy Just as a reminder, a placarding is something that looks like this About a foot square, it says radioactive with a 3/4 symbol A vehicle that is transporting one or more, yella three label packages must be placarded on the two sides, front and rear Now The next one down here is a regulation, which has not really... even when it's a regulation; I have not seen any vociferous type of enforcement on it And that is, that if you are offering to a carrier a yella three label package, then the regulations state that you must say "I your humble carrier may offer you four placards please" Alright That's the regulation, believe it or not And... but I have not seen it rigorously enforced So take it for what it's worth Shipping papers: This is the carrier's part The shipping papers; Number one: Must be

accessible to the driver, when you the driver are at the wheel of your vehicle In other words, if you're sitting up here driving, you must be able to put your hands on the shipping papers or the shipping papers must be in a pouch, on the driver's door This is identified as HazMat or hazardous materials or dangerous goods, or some such information Now If you have to leave the vehicle, and the shipping papers are not in a pouch on the driver's door and if these are the shipping papers, then you must put the shipping papers on the warm spot, on the seat that you just vacated, when you leave Alright Character requirements: Your radioactive materials must be what's called blocked and braced, to prevent movement in the vehicle during normal transport There must be no more than 50 TI (transport indexes) total in a vehicle You must adhere to

separation distances according to this table The total TI in your vehicle And the separation of distance between the closest radioactive material package surface and to the closest surface, pru you, which you present So that gives you some sort of idea as to how far the packages have to be Now If you are driving, or if you're driving, if you gonna take a... that's for a white one yella two or accepted package Accepted package, of course, doesn't have the shipping papers So that's pretty easy Unless they have something else that prohibits you from driving that, those are the regulations, which apply That's not the case if you are driving a vehicle that is labeled, where you're transporting a yella three label package A yella three label package is what requires the placard There is a tie-over between the hazardous materials regulations and what's

called the motor carrier safety vehicle regulations Basically, the same regulations that an

eighteen wheel truck driver has to adhere to. There are two ways of getting there, to the motor carrier safety regulations. One of them is that you're driving a vehicle with a ten thousand pound gross vehicle weight rating or you're driving a vehicle which is required to be placarded, i.e., in radioactive terms a radioactive material packing, yella three label package on it. There are certain financial responsibilities, which apply. There are certain driver qualifications, which apply, such as a two year DOT (Department Of Transportation) should be all capitalized, medical certificate. There should be a, you must be a holder of a commercial drivers license with a HazMat endorsement on that. In driving the vehicle, there's a pre-trip inspection. There's certain safety equipment including snow tires in Louisiana, you must inspect the load within 25 miles or a 150

miles or three hours drive in thereafter and I don't know how many of you people recall, but once every three to four to five years, 60 Minutes likes to run an expose on eighteen wheel truck drivers and their driver's logs. And the conclusion that they always come to is that truck drivers, that most professional truck drivers maintains two sets of logs. One for real and one for show-and-tell. And anyway, you are tied into this 24 hour driver's log, if you're driving this. There is a inspection and maintenance requirement including a written report at the end of your trip and if your transporting hazardous materials, which is the subject of this, then there are certain attendance requirements of the vehicle and you've gotta kick the tires at the start, within the first hundred miles or two hours of driving thereafter and at the end of the trip. On the thing. Now. All of that probably, the

main things being the commercial drivers license, the two year medical and those sort of things is probably gonna kick you out of really wanting to get into driving a radioactive yella three label package. Now. I will give you the solution to this, if you like. The solution to this is if it, you come up with this all the time, what you could do is that you could take and you can build you an over pack. Then if you do your over pack in such a way that you've got enough distance or enough fueling to cut it from a yella two down to a yella three that keeps you out of all this motor carrier vehicle traveling stuff. So then you're back to the yella two requirements again. So then it becomes possible or more feasible in this particular case. Alright. Security – Security is a new requirement, in this training sequence. And this is really about all I'm gonna say about security. Simply

because I think it's really pretty evident. The key that they're really after seems to be accountability of the radioactive material. Ways that you can solve this are such things as a written procedure for your receipt of the radioactive material packages. Route procedures for confirming receipt of radioactive material packages, which you have shipped to somebody and a way to satisfy the training requirement, if you want to go beyond this is that the DOT has a CD rom, which is free. You can order it, get it, take it; you have satisfied all of this if it, your employer decides this doesn't do it. So. That's all I'm gonna say about security. I don't really see it's necessary to really beat a dead horse, in, in this sort of thing. We have mentioned several times the emergency 24 hour telephone number. It's a telephone number, which is monitored at all times, hazard

materials and transportation including storage incidental to transportation. Now. First

off, let me tell you the interpretation for the regulatory laws uses against on this, particularly FAA and the best way I could make my point on this particular one happens to be the fact that, I am the guy, you people, some of you've already learned, I guess I've told you that I am the radiation business consultant to Fed Ex and have been since '78 And I'm the guy who's beeper goes off in the middle of the night or my phone rings when some truck driver has bashed the hell out of a radioactive material package on one of our ramps somewhere and they're about to panic because they are losing their, all future children and everything else and what in the, what in the blue blazes to do about it and over the years I have become acquainted with most of the major radioactive material

shippers of the country, one way or another This particular one is a very, very major radiopharmaceutical company Located in a very, very major metropolitan area and I can basically, something like this happens I can handle the health physics of radiation protection, but what I can't handle is such things as I've got the, this package that I see a whole bunch of these vials running around and I can account for maybe seven of them, but how many of them where in the package I can't find any paperwork, so about the only thing I could do is to call up the shipper to say "Hey, how many vials did you have in this package " So, over the years I've called up this particular shipper, after hours because this is one or two o'clock or three o'clock in the morning, you people realize, and I called to the shipper and the shipper, the main number rolls over to the nice little

guard, security guard at the guard gate The guard out at the guard gate is a very nice fella, he kept it going quite well and I would tell him the fact that I, you know, I needed to talk to somebody about finding some information He would say "Verify" and he says "what's your number " and you know I'll have somebody call you So I'd hang up the phone and go to my kitchen and put me on a pot of coffee because I figured I was probably gonna need it By the time I got my pot of coffee going and my, the phone would be ringing and somebody from this country, company, would be on the other end and in the old days, he would have to bounce out of bed, get dressed, tool down to his shop, open up and get into his records and tell me how many vials was in that shipment Later on, they got smart, equipped him with a laptop and he could dial in from his home

and provide me with the same information Either way it worked Anyway, to make a long story short, one night, FAA was performing one of their blitz inspections of a major airport and they started coming across this paperwork and the FAA guy reached out picked this (inaudible) dialed the number, got the guard at the guard gate Guard at the guard gated says "hmmm, ah fine I'll, what's your name Your telephone number I'll have somebody call you" and the FAA says "No thank you, I have the information that I need " Hung up the phone and issued a fine for twenty-five thousand dollars Alright Therefore, 24 hour telephone number, people Such things as they must not be hung up on, they can only be transferred if transferred immediately A pager will not work Answering service may not work, although if you program it right, you could program

your answering service to regurgitate the emergency response information out of the

emergency response guide or something similar to that and that will probably keep you away from the fines or something like that if you were to program the emergency. If you're in a hospital or a educational institution where there is a main telephone number and operator, you can also program your operators there to put up a sheet that they regurgitate the, tell them the information that they, from the emergency response guide or something similar maybe it'll get you out of... but they want to be able to talk to somebody within a short, reasonably short period of time after dialing in, without being hung up on. So, take it for what it's worth. Questions on 24 hour telephone number. Are you all... is everybody covered. Alright. It's the telephone number of a person who is either knowledgeable of the hazardous material being shipped, he has comprehensive emergency response and incident mitigation information for that material, who knows

immediate access to a person who possesses such knowledge and information. Sort of come up, may only use Chem track number if subscriber or authorized by recipient. Pagers may not be used. Answering service may be used, if forwarded immediately. Answering services may be given appropriate information. I will give you some Irr numbers. Okay, why are you here. You people are here because of the requirement, probably most of you, because you would not go into... you would not normally elect to voluntarily go to such an electrifying subject such as this, without some type of external stimulus and that external stimulus happens to be, thanks to the FAA inspections. Anyway, you're here because of the requirement in 49 CFR subpart H. It defines a HazMat employee. HazMat employee is somebody who loads, unloads, handles,

somebody who tests, recondition, repairs, modifies, marks packaging, somebody who repairs hazardous trucks for transportation, somebody who operates a vehicle transporting hazardous materials. The training must be completed within 90 days after assignment to Haz-Mat duties. Recurrent training, three years the auto two year requirement is not applicable. Subject areas: General awareness, familiarization, function specific, safety training, security, record keeping, maintain during the employment of the individual for 90 days thereafter, including the employees, Haz-Mat employee's name and most recent Haz-Mat training completion date. Description, copy or location of Haz-Mat training materials. That's the handout, if you people will print it out over the AAPM website and remember to, in order to open it up, it said, it's a

PDF file, but it's gonna take Adobe 6, Adobe Reader 6, which you know, all of you know you can get free from the Adobe site if you, you know, if you got an earlier version. Might as well update. The name and address of person providing that training is in there. It's part of that, my name and address. Certification Hazmat employee has been trained and tested. Okay. Number one, I cannot certify you. It's you or the, it's you if your self-employed or your employer that has to do the certification. None of this because I, we do not know, an instructor such as myself, sitting up here, I do not know to what extent, you people are involved in this business. This is sort of wide, weird thing, but I have tried to provide at least, a wide enough breath to cover, pretty much all that, the, the eventualities that you people are going to be into. Okay, it's going to be your employer who's going to

have to say look at this material and look at the test. In my handout there is a test, very

simple, ten question, multiple guess, true/false test, along with the answers, in case you get stuck, that you can self-grade and correct, whatever. Anyway, it's in there. And so, it's your employer that's got to determine, okay, has this presentation today, covered the bases for what we're doing in this company or hospital or whatever. It may be you making that determination for yourself. There is no requirement as to a workshop or anybody else that presents the material. The proof is in the pudding. In other words, the proof is, have I presented the material. Has the material been presented in correct fashion. Proper information, that sort of thing. That's, that's, what's got to be done. Has everything that a, is enough things been covered here to meet what you do. That's the

process. Okay. Employer certifies the trainee. Any questions. Audience: Yeah. Speaker: Okay. Audience: About that three year versus two year requirement. Speaker: Three year versus two. Audience: Yeah. Speaker: Yup. Audience: Now in are all the radiation (inaudible) think that all (inaudible) was inspected by, I do know (inaudible) we were excited because they had radiation (inaudible) had not received training in the last two years. Does that mean that I'm in a ... Speaker: That means that the and if you, if you wanta give me a hold of it I'll call up Steve Collins in Illinois and we'll get it straightened out, but that means that who ever sited them in Illinois, didn't know what the hell they were doing. Can I be anymore blunt than that. Audience: Can I ask a question. Speaker: Yes. Audience: Could you repeat the question. Speaker: Oh. Somebody who'll an and

this place, is a little, you gotta expect that in Illinois and the Illinois Emergency Management Agency was inspecting him and sited them for not being trained every two years... So. Okay. There are no prerequisite qualifications for the course. Instructors. Self training is permitted, people. Anyone may provide HazMat training, provided it's complete, accurate and applicable to the HazMat operations being performed. In other words, if you want to ride on my back, I don't care. Take this information; take it back to your facility. Plagiarize the hell out of it. I haven't copyrighted it. It's not copyrighted anyway. All I'm doing is talking regulations. Plagiarize the hell out of it, present your own training course, just make sure it's complete, do your certification. No rule against it. I certainly cannot train everybody in the world. I enjoy doing it, but heck; I'm willin to

spread it around a little bit. Okay. This course, the downloaded hit on material, constitutes the copy of the training materials, we've talked about. There's a simple test, you can take at any time and the answers are separately provided. The CEU's received from AAPM will provide documentation of your attendance, at this course. Certification that you have met the HazMat training requirements is the responsibility of your employer or you, if you are self-employed. You maybe the individual responsible to your employer for certify HazMat training, therefore, you maybe certifying yourself. It's the employer's responsibility to determine the appropriateness and adequacy of this course and the test. If necessary, supplement it, add to it. I knew it was gonna be quick, but I also wanted to give a short break. Believe it or not, I really didn't realize I was gonna be

able to finish this quickly, but I don't think that any of you people will be filing a formal

protest, probably So, at any rate, I see a bunch of hands, maybe starting with the gentleman over here Yes sir Audience: I've gotta question that when you package the radioactive Machine and hand over to the (inaudible) person, what kind of document do you need to receive from him that you legally hand over to the police with all that (inaudible)Speaker: You don't get anything The, the, the, the proof is had you done it right, then, you a, got to get caught about anything, but the carrier doesn't have to give you anything Audience: So what is it again that you have to be handed over to the (inaudible)Speaker: No guarantees The only guarantee is that you know it well enough that you feel confident that you did it correctly In other words, don't rely up on somebody else to do your, to do your checking for you Audience: What is the problem

and reaction to the (inaudible) was lost and the recipient did not receive it Speaker: What if the package was lost and the recipient didn't receive it Audience: So how do you pull that work (inaudible)Speaker: Well, most places on shipping you get an airmail sort of thing At least proof of yyyou get some sort of receipt, except for the post office In this event, I didn't cover it, but you can mail certain material, but that's a different subject or I could take additional time Let me get back to her next Yes ma'am Audience: When we get our documents in the middle of p m we won't have the right address on there...Speaker: No but, it, it there it is, right there in the handout That's part; the slides are part of the handout The handout is as follows: All of these slides, the test, the answers, there are 96 slides, I think, two page test, two page answers that's a hundred,

that leaves something out About a 153 of the January 26th federal register, which is in there Up over here Audience: I, I was just responding to him, when they pick it up there's a wand or something and you can go to the website immediately ...Speaker: Oh, yeah...Audience: while there are step by step by step so you have documentation right away...Speaker: Yeah...Audience: You can (inaudible)Speaker: That's Fed Ex; some other places don't, but anyway Audience: Can I say one more thing Speaker: Pardon Audience: With your website Speaker: The website Audience: (Inaudible)Speaker: The AAPM's website Audience: (Inaudible)Speaker: Yeah... Yes sir Audience: Are you always your own shipper in the, the following scenarios: Suppose a company comes in and delivers resources for a therapy machine, packs the U sources up in the container

and obviously it hadn't provided any shippers in the first place, and then take them away or somebody picks them up Are you the automatically the shipper under those circumstances Speaker: No sir If he did it, if some service guy comes in and does it, I would have him do the whole thing, fill out the declaration and if you're stuck with the payment on it, that's okay You can still do the declaration, but you can still have the air bill referred to you as the institution that's paying I will say this, I got both of you getting back, anyway, there is a situation where the... I think I answered this, during the break, it's come up What if you people have gotten... your using a company such as Cardinal Health, I'll use them since they're all secure and fairly, fairly extensive, and you, you receive your, your doses at the Nuclear Medicine Department from them and

then you take whatever contaminated vials, sharps and that sort of stuff, repackage them and send them back and the cargo pharmacy guy comes in and takes that shipment back To what extent are you involved in this process Gotta, got involved in this fairly extensively, several weeks ago... and so I called the RSO for Cardinal Health As a result, Cardinal Health maintains that from their viewpoint that because of the hospital I was dealing with at the time, kept saying that it didn't make sense to me, that they, that Cardinal Health was the shipper Cardinal Health's viewpoint is that in this particular case, it is the hospital or Nuclear Medicine Department that is the shipper and you're preparing the shipper for the... Cardinal Health is only acting as a carrier, in this

particular case So, just because you are using their package and everything else, you're still on the hood as a shipper, in a scenario, such as that Okaay... help me out, a couple of you... back here...Audience: I guess you're not probably aware of this, but there is a CD rom from the government, I think its \$25 dollars, that covers most of this with a...Speaker: There is a CD rom that's a covers radioactives and everything else, yes there is, use it judiciously, there's a bunch of mistakes in it Yes sir Audience: When you're talking about packaging up the waste and sending it back to the regular pharmacy, yeah, you package it up in their container and their courier picks it up (inaudible)Are you still considered the shipper Speaker: Yes sir Audience: So you have to fill out all this same paperwork Speaker: Yes sir Audience: I haven't been doing it obviously, since the

good idea about the written procedure for comparing that when you send something to somebody they get it We...what kind, kind of receipt should I get Shouldn't it be enough to say I called up Joe Blow on this date and he said he got it and I just write that on a piece of paper Speaker: That's good or even just get the receipt off of the website or the... if you, if you're using somebodys' automatic tracking system Okay I'll have you start one, two, three, four, I'll start way in the back...Audience: I told the president to leave a message on the shipping to see what reaction would happen upon receiving Is there any requirement to a wipe test (inaudible)Speaker: Okay Number one let me start out by answering this question, in this fashion Let's take a shipper, probably one of the biggest shippers in the country Take either BMS or Mounticrot _ (31:43), I don't

care which Putting out hundreds to thousands of radioactive material packages today, how many of you think, that BMS and Mounticrot wipe test each individual package leaving there They don't They don't They use other methods of contamination control, such as air contamination control such as that The regulations are written to the way very peculiarly that basically, it simply says that thou should not offer for transportation, packages with surface radiation levels in excess of the prescribed limits It's up to you to determine how that's done There are a bunch of shippers in this country, such as industrial radiographers, oil well loggers on a daily basis that shipping, don't even have instrumentation that can read levels down to those levels that are required for that type of surface contamination And so it's a, it is one of those things

that if you have other means, of whether the individual wipe test, you may do so, but you need to have some viable program for contamination control that will give reasonable assurance that a package is not leaving The easiest thing may be to wipe it That's a

round about answer but that's the best one I could give you Okay, comin on, let me get the next one here... Yeah Audience: I, I was under the impression of most of it was sent to the pharmacies, we only will take back as far as (inaudible) meaning maybe it's been those I was under the impression that we're not taking, like a lot of needles or anything that was biological there (inaudible)Speaker: I know a parti, the ones that I was dealing with the other day, they, they was certainly taking needles back and sharps and things Next question... hbb, yes, yes ma'am Audience: You went over the labeling part the for

a yellow three package, is there any chance for a yellow two Since (inaudible) Do we have to have placards in the car Speaker: Yella two No A placard is only required when you're transporting one or more yella three labeled packages Audience: Does yellow two (inaudible)Speaker: Of the two do not require placard Now, you people always... I know that people say, hey look, why did our materials are always got the most stringent regulations This is one, believe it or not that all other countries, you have to placard white ones and yella twos and this is something that the U S Department Of Transportation, thank goodness, has at least, held the line on at the yella three thing and they have not bought into this placarding of white ones and yella twos Alright, somemore questions I know there's a bunch of hands Yes sir Audience: Did you

mention the question of the first amended Fed Ex shipment Was it in writing to Fed Ex Speaker: Yeah Audience: The stereo Speaker: Yeah, yeah Audience: You answered that question Speaker: I thought I answered in detail I thou, that's, that's where, that's where if you're transporting a yella two A white one or yella two The position of the shipping papers Audience: Yes Speaker: The separation distances The blocking and bracing Audience: Okay, this is, this is the guy in the shipping department that just missed, missed the Fed Ex... Speaker: Yeah Audience: Okay you answered all that Okay Audience: Does any of the back of my car and blocked (inaudible)Speaker: Pardon Audience: Is the netting of my trunk blocked and braced Speaker: Yes If it's good netting Yes sir I'm sorry Audience: It's a sort of a liability question I believed

now we reviewed this like we're supposed to... none of this, I mean, I assume, that none of us has really been following the rules up until this day... Now we're finding...Speaker: Oh shame on you! Speak for yourself...Audience: But now, now we finding this (inaudible) is missing and now we're okay, can we be legally fined for a packages that were shipped in the last year (inaudible)Speaker: I've never heard of DOT doing that Audience: Okay Speaker: Let me tell how DOT's enforcement works First off, you have a... you, you're going to see more enforcement activities for the FAA, right now than any other group because several years ago, they got a... mainly because of the Value Jet incident, down in Florida, the oxygen canister incident They got a big boost in their budget for such things as enforcing more rigorously, hazard material transportation

and those people have now gotten power and training and they're out there knocking on doors At one point, FAA only knocked on a carrier's door and that has changed FAA is now knocking on shipper's doors and where they're finding this is that they're doing audits at airports, coming up with the names of the shippers or coming up with our business shippers Okay, they're looking at such things as the, the, the requirements on

such as training. So they got the documentation, that sort of stuff. If you get, such things as a packaging problem, things of this nature, that falls under a group called RESPA, research in special programs administrations in Department Of Transportation. There is only in existence, within RESPA, one enforcement person for the whole country and if I am reading my email correctly, because I was in Nashville last week and I read it, this is

a very attractive young lady that I taught several courses to out of Paducah, Kentucky that whose husband moved to Bagdad, Potomac and she got a, because of her background, she got the position as the inspector for organic materials at RESPA and if I'm reading her email correctly, she has now transferred over to the Federal Railroad Administration. So at the moment, within RESPA, I don't think there is any enforcement person period. If you are talking about the DOT as to how many people speak radioactive, at DOT, the answer happens to be three. Rich Boyle is the chief of the section, Fred Ferate and a guy by the name of Jim Smith. Those are the only three people that speak radioactive material within the Department Of Transportation of Washington. So you're only gonna get those sort of people and something very extraordinary that may happen. The other

place that you may... not much, will be from the Motor Carrier Safety people that are in regions, just like the FAA are. You may receive inspections from them, but you, your most, your biggest liability is probably the FAA. Yes sir Audience: Doesn't the Department Of Transportation require that within the shipping papers a (inaudible) saying how you would you clean if they spill (inaudible) Speaker: No. You're talking about the emergency response information. A lot of people misinterpret that. The... First off, it is not required to attach to the shipping paper, emergency response information, believe it or not. You certainly may do so, but it is not required. What is required is, is that you the shipper, have available emergency response information at appropriate spots within your facility, i e , such as you shipping dock and the existence of

the Emergency Response Guide, if you don't want to do your own, you may use the DOT's Emergency Response Guide, to fulfill this requirement. Carriers such as Fed Ex, You own a motor freight, UPS whoever, we are required to also have emergency response information available to us, in all of our aircraft, all of our vans we have a copy of the Emergency Response Guide. It is sort of ludicrous in a way, an and I think I can speak from, from many years of experience on this; it is sort of ludicrous in a way, as to the fact that what are you going to do. You the shipper are going to take and put on your... as attached to your declaration, your emergency response information and you're going to take that shipping paper and everything and put it on the package, which is now going to be damaged. Is that a good place to look for the emergency response

information. No. I very rarely look for any information on that. Most of the time, I can't find it anyway, during the emergency, if the package had been really damaged. So the fact that you're to attach the Emergency Response information to a shipping paper, number one it's not required. Number two it's sort of ludicrous and anyhow Audience: (Inaudible) Speaker: When you think of drivers, drivers have got too much to do anyway, not enough time to do it in, so the requirement is, is a copy of the... this is not it, but to give you an example, a copy of the DOT Emergency Response Guide, in the

driver's door, that's it, meets the requirements All you got to do to satisfy them is to take a copy of the Emergency Response Guide, make that available in your shipping dock Audience: (inaudible) Speaker: Pardon Audience: Would you condone... it's not open,

by comparison... Speaker: So If it's not open, then there's no problem there, is there Yes sir Audience: Could we take some time and cover what can and cannot be shipped in regular US mail Speaker: I can give you a very quick answer, if that's what you would like You take by... you take the accepted package values for a limited quantity; knock each docket down by a factor of 10, that's it Audience: (inaudible) Speaker: That's right You're... if you're looking for information on that, call up the post office, ask them for publications 6 and publication 52 If you call up the local post office or you ask them for publications 6 and publication 52, they're going to say "WHAT" Keep pressing them, they'll find it Audience: When you ship the same package then, is that activity through Fed Ex, you still have to provide, still treat it as a regular moving kind of

package... Speaker: That is correct Fed Ex is not U S mail... Audience: If this mail going... Speaker: That's right Audience: (inaudible) Speaker: Yes sir Audience: Do physicians or licensed physicians have less responsibilities in shipping (inaudible) Speaker: No Audience: (inaudible) Speaker: Right Yeah, there used to be this provision, in some of the agreements, State regulations, whatever That particularly, a radiologist... there was a revision that sort of gave him carte blanche, to give hm, to carry his radium C's from hospital to hospital or whatever Yes sir Audience: Can the local state DOT's supersede these regulations of more restrictive things, like they often do, with radiological stuff Speaker: No There is a preemption clause within the Department Transportation regulations and if it appears that there is a excuse me, if there is a conflict,

a more stringent regulation coming out of the state or local government, then you can go into entering what's called a preemption proceedings and there have not been any preemption proceedings for years It used to be quite popular for various localities, municipalities, towns to put on all sorts of prohibitions and these present procedures, pretty well knocked that down Yes ma'am Audience: I had an inspector from the state of Florida tell me that I have to be trained at each physical site that I'm at, separately, like I can't use this HazMat training and just publish it at all the sites that I go to Speaker: Malarkey And if he argues with you call me up, we'll talk to somebody. Audience: I just like to clarify this point about the physician carrying a Type 1 package from hospital A to hospital B Being as a carrier, you as a shipper, he as a carrier has to have a copy of

the DOT, and since its Type 1 There won't be any... Speaker: I don't know what a Type 1 is Audience: As long as the packaging is correct ... Audience: Point one... Speaker: Point what Wait... Say, say this again now Audience: A Type 1 or Type 2 is (inaudible) Speaker: What were the other two Yeah, as long as he's carrying it he's got to do what I'd said Have the shipping papers accessible to him, in the pouch in the driver's door, separation distance, blocking and bracing... Audience: Does DOT (inaudible) Speaker: Yeah, yeah... The reason that I give such a quick, frivolous, maybe answer, quick answer to you is that in my past lifetime, somewhere along the line, I was

also the director of a States Radiation Control Program So I was speaking from authority from that viewpoint to Yes ma'am Audience: If it's not related to shipping

then how are these localities doing with this independent cell phone laws Speaker: Pardon Audience: The cell phone laws that have been in different jurisdictions (inaudible)Speaker: Cell phone laws and this have no, no commonality There is for that you, wa, what we're talking about here is hazardous materials, dangerous goods... There is nothing to do with cell phones and what I'm talking about is in the terms of the inconsistencies and compatibility, is strictly based into a written, into the hazardous materials regulations Herb is coming up Herb will...New Speaker: He's in the other hands so...Speaker: People thank you I've enjoyed it, hope you got something out of it