



GEMC ENVIRONMENTAL MANAGEMENT CONSULTANTS INC. NEWSLETTER

LET'S KEEP IT GREEN

NOVEMBER 2008 EDITION



GEMC IS OFFERING 2009 A.I.R.

Shipper™ A.I.R. Shipper™ is the first shipper-friendly publication recognized by the International Civil Aviation Organization (ICAO). This publication helps you comply with international regulations for shipments of dangerous goods by air. It combines international dangerous goods air regulations with related national requirements, so you have all the information you need to ship safely and in compliance in one resource. GEMC is confident that A.I.R. Shipper™ will help your company stay in compliance with dangerous goods regulations and increase shipping safety, accuracy and efficiency.

New 2009 Edition of A.I.R. Shipper™ Features

- New packing instructions, proper shipping names and markings for lithium batteries
- New fuel cell requirements
- Updated excepted quantity requirements and marking
- Reformatted RAM chapter
- New Cargo Aircraft Only Label (2011)

ICAO To Introduce New Packaging Instructions

ICAO has published the proposed texts of the reformatted packing instructions on its website at www.icao.int. The page includes all the packing instructions in English (other languages will follow) together with an Excel spreadsheet showing the correspondence between the old and new packing instruction numbers. Users can submit comments and suggest improvements via the website. ICAO would welcome feedback ahead of the 22nd meeting of the Dangerous Goods Panel in October 2009, when the final texts will be approved. Although they are not due to enter into force until January 1, 2011, the draft packing instructions will be included in the 2009-2010 edition of the Technical Instructions (and in the IATA Dangerous Goods Regulations and LabelMaster's AIR Shipper) so that shippers have enough time to adapt their computer systems and, possibly, arrange for alternative packagings.

GHS NEWS - The European Parliament has agreed a method to implement the GHS provisions for the classification, labelling and packaging of chemicals in European legislation. Under a compromise agreement, the three directives currently in place will be replaced by a common system that will harmonize EU legislation as closely as possible with GHS while also maintaining the current level of safety and environmental protection. It is expected that the new regulations on the classification and labelling of substances will be in force on December 1, 2010 and for mixtures on June 1, 2015; the existing directives on classification, labelling and packaging will be repealed on June 1, 2015.

Powder Poof! Dust in the Workplace Can Combust

- Disasters don't always start with chemicals. Even something as sweet as sugar can explode, as the people of Port Wentworth, GA found out when a sugar dust explosion at the Sugar Dixie Crystals plant killed 13 people and left others critically injured with severe burns. The Oregon branch of the U.S. Occupational Safety and Health Administration (OSHA) has issued an alert to warn industries of the dangers of combustible dust. Injuries and fatalities have occurred in the state of Oregon because of a wood-dust fireball, dust flash from powder-coating filters, and a grain-dust explosion.

Assessing the risk- The Industrial Fire Hazards Handbook from the National Fire Protection Association states "any industrial process that reduces a combustible material and some normally non-combustible materials to a finely divided state presents a potential for a serious fire or explosion." Industries that are potentially at risk include those that manufacture or handle food (such as candy, starch, flour or feed), plastics, wood, rubber, furniture, textiles, pesticides, pharmaceuticals, dyes, coal, metals (such as aluminum, chromium, iron, magnesium, and zinc), and industrial plants that generate fossil-fuel power. Any "material that will burn in air" in a solid form can be explosive when in a finely divided form. It is possible for different dusts of the same chemical material to have different ignition and explosive characteristics. These depend on particle size, shape, moisture content, and other variables. If you are not sure whether or not a product produces combustible dust, one possible source of information is the Material Safety Data Sheet (MSDS) for the product, however OSHA recommends checking with the chemical manufacturer for additional information.



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COSTHA Requests New Section for 49CFR on Reverse Logistics - The COSTHA Steering Committee

on the Reverse Logistics Partnership with the US Department of Transportation Pipeline and Hazardous Materials Administration (PHMSA) recently announced that they have formally requested that DOT add a new section to the regulations on the Transport of Hazardous Materials (or Dangerous Goods) §173.157 - General Requirements and Exceptions for Reverse Logistics. COSTHA members identified an issue that they felt posed a significant risk to transportation safety. Substances and articles regulated by 49 CFR as hazardous materials are distributed from manufacturing facilities to various wholesale and retail outlets for sale to consumers. Many of these products meet the classification criteria of ORM-D and are shipped under the proper shipping name Consumer Commodity. The regulations provide adequate controls over transportation for the purpose of distribution to the consumer. An undetermined quantity of these products is returned to the vendor. The persons engaged in packaging the products for return or offering the shipments in reverse logistics might often be retail store clerks. The packagings used for reverse logistics shipments are often not the original packagings as offered by the manufacturer and received by the distributor and may consist of any packaging materials convenient within that facility. Reactive hazardous materials may not be properly segregated within the packaging or within over-packs and cargo transport units. These shipments may be offered as "non-declared" hazardous materials and may be transported by all modes of transportation, including aircraft, The COSTHA petition for rulemaking asks for regulatory relief for the following materials in specified quantities.

- Division 1.4S and 1.4G fireworks (
- A Class 3, 8, 9, Division 4.1, 5.1, 5.2, 6.1, 6.2, or ORM-D material
- A Division 2.1 or 2.2 material in a cylinder or aerosol container with a gross weight not over 30 kg.
- A Division 4.3 material in Packing Group II or III contained in a packaging having a gross capacity not exceeding 1 L.
- Division 6.2 material