

Scope and use of U.S. DOT special permits through CRCPD Notes of 15 May 2007

U.S. DOT has issued two exemptions, now special permits, through CRCPD, for commercial transportation within the U.S.

- of shipments found to contain unidentified radioactivity, to 50 mrem/h at the surface of the conveyance, in scrap metal or related metal recycling material (E-10656)¹, or in waste or recycled materials destined for landfill, incineration or other disposal (SP-11406)¹;
- for movement over the best and shortest highway or rail routes (not air or water)²
 - within a state or between states and, with their cooperation, to Canada or Mexico³
 - of either the entire shipment or the radioactive part of it,
 - by either the original vehicle or another,⁴
 - to either the shipper or a better facility at which to identify and deal with the radioactivity;
- as authorized by the radiation control authority of the state in which the radioactivity was discovered, who:
 - had once registered with the CRCPD to use the exemption, whatever revision of it,
 - has determined, or has reputable advice, that the package or conveyance surface has < 0.50 mSv/h but significantly above ambient radiation, that radioactive material will not be released during shipment, and that the radiological risks are equivalent to those in normal transport within the regulations;
 - opts to approve use of the exemption for the shipment at hand,
 - has, after reference to records of exemption use, assigned a shipment approval number which is the number of shipments (n) that year (Y) from the issuing state (S_i) to the destination state (S_d), in the sequence S_i S_d Y n (two examples: GA-FL-99-03 and IL-QC-99-03),³
 - has completed and signed the appropriate DOT issued specific shipment approval form,¹
 - has transmitted the approval, prior to shipment, to the shipper, the facility at which the radioactivity was discovered (for copying to the operator of the motor vehicle or dispatcher of the rail company), the facility to which the vehicle will be moved for identification of the radioactivity, the radiation control authorities over those two facilities, and the CRCPD office,
 - has required railroad management to identify the rail car and its position in the train to the train crew;
 - has telephoned the radiation authority in the state of destination to confirm their receipt of the shipment approval form and advise them as to the estimated time of arrival;(approval of return shipment by the destination state RCP is not required but likely will be for Canada or Mexico).

In the destination state, authorities should assure that the radioactivity is assessed and properly dealt with, and that brief descriptions of the radioactive material and its disposition are reported as an additional entry on the shipment approval form to the radiation control officials and commercial firms involved with the shipment and to the CRCPD office.

- 1 The exemptions, including shipment approval forms, are at http://hazmat.dot.gov/sp_app/special_permits/spec_perm_index.htm Links to these and to the list of persons registered to approve shipments are on www.crcpd.org under Free Documents, Transport Related. Provide the information in size and boldness that will serve for two successive telefaxings. In describing cargo, include one of the categories to which the exemption applies, e.g. "baled scrap steel." Report the gross (including background) radiation readings at the surface of vehicle, or package of an unenclosed vehicle, in mr/hr (5 μ r/h as 0.005 mr/h); background rates are entered separately on the form.
- 2 Questions about radioactive cargo may be directed to Wm. Wilkening, Fed. Aviation Admin., 202/267-9864; Coast Guard 800/424-8802 (any mode during non-business hours); William Quade, Fed. Motor Carrier Safety Admin., 202/366-2172; Michele Sampson Fed. Railroad Admin. 202/493-6475; and Fred Ferate in Pipeline & Hazardous Material Safety Admin. 202/366-4545.
- 3 For Mexico, contact Jose Luis Delgado, 011-52-55-5095-3210, fax-3291, e-mail jldelgado@cnsns.gob.mx
For Canada, contact Phillip Eyre, 613/995-0537 phillip.eyre@cnsccsn.gc.ca
Then notify Customs & Border Protection of shipment details: richard.t.whitman@dhs.gov or luke.mccormick@dhs.gov 317/614-4843, -4844
Mail codes for exemptions are AB=Alberta, BC=Br. Columbia, MB=Manitoba, NF=Newfoundland, NS=Nova Scotia, ON=Ontario, QC=Quebec, SK=Saskatchewan, NB=New Brunswick, MX=Mexico
- 4 The shipment approval pertains to the radioactive material and the vehicle in which it is moved. If that is a different vehicle from the one in which the radioactivity was discovered, please identify the original vehicle and cargo in the space for special conditions, e.g. " The radioactive item was discovered among scrap iron in Railroad Co's gondola #12345"