DOT Requirements Applicable to Hazardous Waste Generator’s

- Comply with training requirements
- Properly identify waste being shipped
- Select an authorized package
- Properly mark the package
  - EPA & DOT marking requirements
- Complete the shipping paper (HW Manifest)
- Comply with placarding requirements
Training

- Each Hazmat Employer Must:
  - Train and Test
  - Certify
  - Develop and retain records of current training (inclusive of preceding three years) for each hazmat employee (during the period of employment and 90 days thereafter)
DOT Requirements Applicable to Hazardous Waste Generator’s

- Training (49 CFR 172.704)
  - Hazmat employers must provide training to their hazmat employees & shall include:
    - General awareness training - enabling the employee to recognize & identify hazardous materials
DOT Requirements Applicable to Hazardous Waste Generator’s

- Training 172.704 - cont.
  - **Function Specific** – hazmat employee must receive specific training to the hazmat function(s) performed
  - **Safety training** – shall include emergency response information, methods of avoiding accidents such as proper handling procedures, & measures to protect themselves from exposure
Training 172.704 - cont.

- **Security awareness & In-depth security training**
  - Refer to Subpart I (172.800 & 172.804) for security plan specifics

- **Initial & recurrent training**
  - Initial completed within 90 days of hire or change in function, may work under direct supervision of knowledgeable hazmat employee until training is completed
  - Recurrent must be done at least every 3 years
  - Relevant training received from a previous employer or other source is also acceptable
DOT Requirements Applicable to Hazardous Waste Generator’s

- Training 172.704 - cont.

**Training Records Must Include:**

- Hazmat employee's name
- Completion date of most recent training
- Training Materials (Copy, description, or location)
- Name and address of hazmat trainer
- Certification that the hazmat employee has been trained and tested
Identify Your Waste

- Generator knowledge
- Testing of waste material
- Go to the “101 Table” (columns 2 – 5)

49 CFR 172.101
Examples of Basic Descriptions

Acetone, 3, UN1090, PGII
Phosphoric acid solution, 8, UN1805, PGIII

On January 1, 2013, the sequence will be altered to match the international sequence:

1. UN ID number
2. Proper shipping name
3. Hazard class
4. Packing group

At that time, the basic description for these chemicals would be:
UN1090, Acetone, 3, PGII
UN1805, Phosphoric acid solution, 8, PGIII
Package Selection

- Refer To The “101 Table”
- Determine Mode Of Transportation
- Select Authorized Packaging & Check For Exemptions (Col. 8)
- Review Special Provisions (Col. 7)
Improper Packaging

Result of lithium batteries that were not packaged properly
<table>
<thead>
<tr>
<th>Generator ID Number</th>
<th>Generator’s Name and Mailing Address</th>
<th>Generator’s Site Address (if different than mailing address)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transporter 1 Company Name</td>
<td></td>
<td>U.S. EPA ID Number</td>
</tr>
<tr>
<td>Transporter 2 Company Name</td>
<td></td>
<td>U.S. EPA ID Number</td>
</tr>
<tr>
<td>Designated Facility Name and Site Address</td>
<td></td>
<td>U.S. EPA ID Number</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Facility’s Phone:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Material Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))</th>
<th>Containers</th>
<th>Waste Codes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Special Handling Instructions and Additional Information</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Generator’s/Offeror’s Printed/Typed Name</th>
<th>Signature</th>
<th>Month</th>
<th>Day</th>
<th>Year</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>International Shipments</th>
<th>Import to U.S.</th>
<th>Export from U.S.</th>
<th>Port of entry/exit:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Transporter Signature (for exports only)</th>
<th>Date leaving U.S.:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Transporter Acknowledgment of Receipt of Materials</th>
</tr>
</thead>
</table>
Uniform Hazardous Waste Manifest is the Shipping Paper For Hazardous Waste

- Select basic shipping description from the 172.101 Table by:
  - Selecting proper shipping name (PSN)
  - Hazard Class
  - ID number
  - Packing Group
  - Total quantity being shipped
  - If the PSN does not include the word “waste” & hazardous waste is being shipped the word waste must precede the proper shipping name
Uniform Hazardous Waste Manifest is the Shipping Paper For Hazardous Waste

- Shipping Paper Cont.
  - Check 172.203 (additional descriptions)
  - Technical names for generic descriptions (n.o.s)
  - Check App. A of 172.101 Table & determine if material is a “RQ”
  - Check App. B of 172.101 Table & determine if material is a Marine Pollutant (may not be applicable)
Uniform Hazardous Waste Manifest is the Shipping Paper For Hazardous Waste

- Shipping Paper Cont.
  - Provide Emergency Response Information
    - (E.R.G. # or MSDS form)
  - Emergency Response Telephone number, see 172.604
    - Monitored at all times the material is in transportation (until it is accepted at TSD)
    - Person must have knowledge of material being shipped & have comprehensive ER information of the material or immediate access to someone who has this knowledge.
Uniform Hazardous Waste Manifest is the Shipping Paper For Hazardous Waste

- Shipping Paper Cont.
  - **Generator Certification 172.204**
    - By signing the manifest the generator is certifying the consignment is fully & accurately described by the proper shipping name, classified, packaged, marked, labeled, & in all respects in proper condition for transport...
Properly Packaged & In Proper Condition for Transportation?
Properly Packaged & In Proper Condition for Transportation?

- Bung was not tightened

- Does not meet the minimum packaging standard at 49 CFR 173.24
Properly Packaged & In Proper Condition for Transportation?

- Must make sure package is closed in accordance with closure instructions
- In this case a plastic bung was used in place of a metal one
DOT Requirements Applicable to Hazardous Waste Generator’s

- General Non-Bulk Marking Requirements 172.301

  - For hazardous waste EPA marking required at 40 CFR 262.32 must be on package & include:
    - Generator’s name & address, manifest document #, proper shipping description, technical names, special permit #
  
  - Other prescribed DOT markings shall be used, where required, such as package orientation arrows for liquids, inhalation hazard, marine pollutant for vessel transportation (where applicable), or Biohazard
DOT Non Bulk Package Markings

- Types of Markings:
  - EPA Marking
  - DOT Hazard Warning Labels
  - Package Orientation Arrows
DOT Requirements Applicable to Hazardous Waste Generator’s

- Labeling Requirements - Subpart E

  - Label(s) selection, Column 6 of 172.101 Table
  - Label placement on package 172.406
    - Same surface of package and near PSN
    - Primary & subsidiary labels, when required, must be next to each other (within 6 inches of each other)
    - As of 10/1/05, all subsidiary labels must contain a hazard class or division number in the lower corner
DOT Non Bulk Package Marking

• DOT Hazard Warning Labels:
  • Same surface of package and near PSN
  • Primary & subsidiary labels, when required, must be next to each other (within 6 inches of each other)
Placarding
DOT Requirements Applicable to Hazardous Waste Generator’s

- Placarding Requirements - Subpart F
  - Placard selection, Column 3 of 172.101 Table
  - Generator’s responsibility 172.506
    - Each person offering a motor carrier a hazardous material for transportation by highway shall provide to the motor carrier the required placards for the material being offered prior to or at the same time the material is offered for transportation, unless the carrier’s motor vehicle is already placarded for the material as required by this subpart
Placarding

• General rules:
  - Must appear on all four faces of the tractor/trailer
  - Required for:
    • Bulk packaging regardless of quantity
    • **Table 1** - Any quantity
    • **Table 2** - Equals or exceeds 1001 lbs. or 454 Kg in non-bulk packaging or **any quantity** in bulk packaging
    • Joint responsibility of shipper and carrier

• 49 CFR 172.500
DEP Vehicle Marking Requirements
DEP Contacts

- **24 Hr. Emergency Hotline** (spills, abandoned waste, & other environmental concerns)
  
  877-WARN-DEP (877-927-6337)

- **Transportation Oversight Unit**
  
  (ofc.) 609-292-6305  Bob Gomez, Hazardous & Solid Wastes

- **DEP Transporter Registration**
  
  (609) 292-7081 follow voice prompts

- **NJ DEP Solid & Hazardous Waste Web page**
  
  http://www.nj.gov/dep/dshw/