DOT Requirements Applicable to Hazardous Waste Generator’s

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

<table>
<thead>
<tr>
<th>Hazardous Waste Manifest</th>
<th>Hazardous Waste Manifest</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description</td>
<td>Description</td>
</tr>
<tr>
<td>Date</td>
<td>Date</td>
</tr>
<tr>
<td>Quantity</td>
<td>Quantity</td>
</tr>
<tr>
<td>Description</td>
<td>Description</td>
</tr>
<tr>
<td>Date</td>
<td>Date</td>
</tr>
<tr>
<td>Quantity</td>
<td>Quantity</td>
</tr>
</tbody>
</table>

The image shows two examples of hazardous waste manifests, one new and one old.
<table>
<thead>
<tr>
<th>Symbol</th>
<th>Hazardous materials descriptions and proper shipping names</th>
<th>Hazard class or Division</th>
<th>Identification Numbers</th>
<th>PG</th>
<th>Label Codes</th>
<th>Special provisions (§172.102)</th>
<th>(8) Packaging §173.***</th>
<th>(9) Quantity limitations</th>
<th>(10) Vessel stowage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Exceptions Non-bulk Bulk</td>
<td>Passen- ger air craft/rail Cargo air-craft only Location Other</td>
<td></td>
</tr>
<tr>
<td>G</td>
<td>Corrosive liquids, n.o.s</td>
<td>I</td>
<td>8, 3</td>
<td>II</td>
<td>B2, IB2, T11, TP2, TP27</td>
<td>None 202 243 I L 30 L</td>
<td>C 25, 40</td>
<td></td>
<td></td>
</tr>
<tr>
<td>G</td>
<td>Corrosive liquids, oxidizing, n.o.s</td>
<td>I</td>
<td>8, 5.1</td>
<td>III</td>
<td>IB3, T7, TP1, TP28</td>
<td>None 203 241 5 L 60 L</td>
<td>B 40</td>
<td></td>
<td></td>
</tr>
<tr>
<td>G</td>
<td>Corrosive liquids, toxic, n.o.s</td>
<td>I</td>
<td>8, 6.1</td>
<td>II</td>
<td>B2</td>
<td>None 202 243 I L 30 L</td>
<td>C 89</td>
<td></td>
<td></td>
</tr>
<tr>
<td>G</td>
<td>Corrosive liquids, water-reactive, n.o.s</td>
<td>I</td>
<td>8, 4.3</td>
<td>III</td>
<td>IB3, T7, TP1, TP28</td>
<td>None 203 241 5 L 60 L</td>
<td>B 40</td>
<td></td>
<td></td>
</tr>
<tr>
<td>G</td>
<td>Corrosive solid, acidic, inorganic, n.o.s</td>
<td>I</td>
<td>8</td>
<td>II</td>
<td>IB7, TP1</td>
<td>None 202 243 I L 5 L</td>
<td>E ...............</td>
<td></td>
<td></td>
</tr>
</tbody>
</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, packed, marked, labeled, & in all respects in proper condition for transport...
Properly Packaged & In Proper Condition for Transportation?
DOT Requirements Applicable to Hazardous Waste Generator’s

- **Training 172.704**
  - Hazmat employers must provide training to its 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
DOT Requirements Applicable to Hazardous Waste Generator’s

- 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
DOT Requirements Applicable to Hazardous Waste Generator’s

- Package Selection
  - Determine how much waste is being generated
    - Lab pack quantities, 55-gallon drum amounts, or cargo tank trailer quantities (bulk or non-bulk quantities)
  - What state is the waste in?
    - Liquid, solid, semi-solid (sludge), or gaseous
  - Once the quantity & state of waste has been determined refer to the 172.201 Hazardous Materials Table and refer to Column 8 to identify acceptable packages and exceptions, & then check Column 7 (Special Provisions)
# 172.101 Hazardous Materials Table

## Research and Special Programs Administration, DOT

### §172.101 Hazardous Materials Table - Cont’d

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Hazardous materials descriptions and proper shipping names</th>
<th>Hazard class or Division</th>
<th>Identification Numbers</th>
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<th>Label Codes</th>
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<th>(8) Packaging §173.***</th>
<th>(9) Quantity limitations</th>
<th>(10) Vessel stowage</th>
</tr>
</thead>
<tbody>
<tr>
<td>G</td>
<td>Corrosive liquids, n.o.s</td>
<td>8 UN1760</td>
<td>II 8, 3</td>
<td>B2, IB2, T11, TP2, TP27</td>
<td>None</td>
<td>202</td>
<td>243</td>
<td>1 L</td>
<td>30 L</td>
</tr>
<tr>
<td>G</td>
<td>Corrosive liquids, oxidizing, n.o.s</td>
<td>8 UN3093</td>
<td>III 8, 5.1</td>
<td>IB3, T7, TP1, TP28</td>
<td>None</td>
<td>201</td>
<td>243</td>
<td>0.5 L</td>
<td>2.5 L</td>
</tr>
<tr>
<td>G</td>
<td>Corrosive liquids, toxic, n.o.s</td>
<td>8 UN2922</td>
<td>II 8, 6.1</td>
<td>A7, B10, T14, TP2, TP13, TP27</td>
<td>None</td>
<td>202</td>
<td>243</td>
<td>1 L</td>
<td>30 L</td>
</tr>
<tr>
<td>G</td>
<td>Corrosive liquids, water-reactive, n.o.s</td>
<td>8 UN3094</td>
<td>III 8, 6.1</td>
<td>B3, IB2, T7, TP2</td>
<td>None</td>
<td>201</td>
<td>243</td>
<td>0.5 L</td>
<td>2.5 L</td>
</tr>
<tr>
<td>G</td>
<td>Corrosive solid, acidic, inorganic, n.o.s</td>
<td>8 UN3260</td>
<td>II 8, 4.3</td>
<td>IB7, IP1</td>
<td>None</td>
<td>202</td>
<td>243</td>
<td>1 L</td>
<td>5 L</td>
</tr>
</tbody>
</table>

### Notes
- **Packaging §173.***
  - Exemptions: None
  - Non-bulk: 202, 243
  - Bulk: 1 L, 30 L
- **Quantity limitations**
  - Passenger aircraft: 1 L, 30 L
  - Cargo air-craft only: 5 L, 60 L
- **Vessel stowage**
  - Location: C, B, A, E
  - Other: 25, 40, 89
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 #, or DOT-E # issued prior to 10/1/07 are authorized
  
  - 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)
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
DOT’s Webpage

http://hazmat.dot.gov/
DEP Vehicle Marking Requirements
Are you using a reputable hauler?
DEP Contacts

• 24 Hr. Emergency Hotline (Spills, abandoned waste, etc.)
  877-WARN-DEP (877-927-6337)

• Transportation Oversight Unit
  (ofc.) 609-584-4180  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/