

Hazardous Materials Transportation Training

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Hazardous Materials Statistics

- 300 million shipments annually U.S.
- 15, 619 incidents in 2005 (10% less than 2001)
 - 13,133 were by highway
- \$48 million damage in 2005
 - (42% less than 2001)
- California
 - 1,261 incidents (1,100 by highway)
 - \$3.1 million damage



Why Training Required

- Prevent transportation accidents
- Worker and public safety
- Environmental protection
 - ValuJet Flight 592 - Chemical oxygen generators on a commercial airliner ignited causing the crash into the Florida Everglades in 1996 killing 110 passengers and crew.



Overview

- General awareness
- Recognize/identify hazardous materials
- Function specific training
- Hazardous materials safety
- Accident avoidance
- Emergency response



Training Mandatory

- Hazmat Employee is anyone who directly affects hazardous materials transportation safety.
- DOT 49 CFR 172.704



Training Frequency

- Initial Training
- Refresher every 3 years , or
- After regulations change
- When new chemicals introduced



Training Standards



- Self-training is acceptable
- Direct supervision is allowed by a properly trained and knowledgeable hazmat employee for a period of 90 days, or until the required training is provided
- Hazmat employer certifies employee trained and tested



Violations of HazMat Regs



- Maximum penalty
- Civil - up to \$27,500 per violation
- Criminal – up to \$500,000 &/or up to 5 years imprisonment
- California Highway Patrol enforced
 - On road and at facility!



Applicability for Anyone:

- Packaging, labeling, & transporting hazardous materials and
- Signing manifests and other shipping document.
- e.g.
 - Household Hazardous Waste
 - Load Checking
 - Maintenance Facilities




Today's Training Disclaimer

- Only for personnel handling or signing prepared transportation documents on consistent materials or wastes
- More training needed to prepare manifest or involved with other hazardous materials




Training Topics

- Recognize/identify hazardous materials
- Packaging
- Labeling
- Shipping documents
- Putting it together
- Test




Definitions

- DOT – Department of Transportation (regulates transportation of hazardous materials)
- RCRA – Resource Conservation Recovery Act, 1976 (defined hazardous waste and management system)
- TSDF – Treatment, Storage, or Disposal Facility



Definitions

- Hazardous Materials
- Hazardous Wastes
- Recyclable Hazardous Wastes
- Universal Waste



SR

Hazardous Materials

- Capable of posing unreasonable risk when transporting in commerce
 - To health
 - To safety
 - To property
- Meets one of more hazard class, or
- Designated by DOT Secretary
- Includes Hazardous Waste



SR

Hazardous Waste

- Flammable/Ignitable
- Poison
- Corrosive
- Reactive



- Subset of hazardous materials

SR

Recyclable Hazardous Waste

- Have transportation exemptions for recycling (otherwise California hazardous)
 - Latex paint
 - Used oil
 - Used oil filters
 - Lead acid batteries
 - Antifreeze



SR

Universal Wastes – EPA created

- They are frequently generated in a wide variety of settings other than the industrial settings usually associated with hazardous wastes;
- They are generated by a vast community, the size of which poses implementation difficulties for both those who are regulated and the regulatory agencies charged with implementing the hazardous waste program; and
- They may be present in significant volumes in non-hazardous waste management systems.
- Listed by EPA and DTSC

SR

Universal Waste Standards

- Reduced administrative requirements
 - No manifest
 - No registered hauler
 - Take to non-TSDF
- Typical “handle” as non-hazardous if recycled

SR

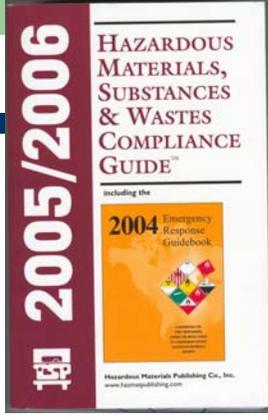
Universal Waste

- "Universal waste" means a hazardous waste identified as a listed universal waste and is exempt from hazardous waste management requirements and, therefore, are not fully regulated as hazardous waste. [Health & Safety Code → 25123.8, CCR Title 22, →66261.9]
- Fluorescent Lights
- Batteries, dry cell
- CRTs
- Consumer Electronic Devices (CED) E-waste
- Mercury devices
- Aerosol cans



2005/2006 HAZARDOUS MATERIALS, SUBSTANCES & WASTES COMPLIANCE GUIDE™

including the 2004 Emergency Response Guidebook



Package/Packaging Reqts

- Proper classification
- Description (shipping name & ID)
- Correct Packaging (certification)
- Mark correctly
- Comply with regulations



Package Containers

- Drums – metal or plastic, various sizes
- Boxes
- Roll-off



Drum Packaging

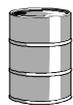
Lab Pack Bulk

Loose Pack



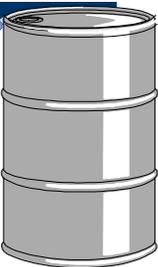
Container Testing

- Drop
- Stacking
- Leak
- Topple
- Tear
- Vibration
- Heat/Cold
- Others



Package Certification

- e.g. UN 1A2/X430/S
 - UN = United Nations
 - 1 = Drum
 - A = Steel
 - 2 = Open Head
 - X = Holds all 3 packing groups
 - 430 = max kilograms inc drums
 - S = solids
- Therefore = Lab pack solids**



United Nations Markings Code

Most common markings $\begin{matrix} u \\ n \end{matrix}$ or UN

Container type	Material	Covering	Packing Group	Weight limit	Physical State
1 = drum 4 = box 6 = composite	A = steel B = aluminum G = fiberboard H = plastic N = Metal	1 = closed 2 = open	X = I,II,III Y = II,III Z = III	Decimal = specific gravity OR Kilograms (including drum)	L = Liquid S = Solid

Sample UN Marking

Type	UN Marking
55 gal., steel, open	1A2/Y1.6/150
55 gal., steel, closed	1A1/X1.5/300
30 gal., steel, open	1A2/Y1.5/150
55 gal., plastic, open	1H2/Y165/S
55 gal., fiber, open	1G/Y125/S

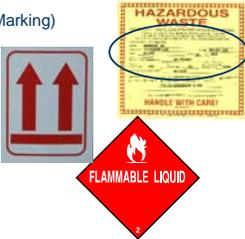
Reconditioned Drums



- Country of reconditioning e.g. USA
- Name/address or symbol of reconditioner
- Last two digits of year reconditioned
- Letter "R" (or v symbol)
- Letter "L" if passes leak proof test

Drum Labeling

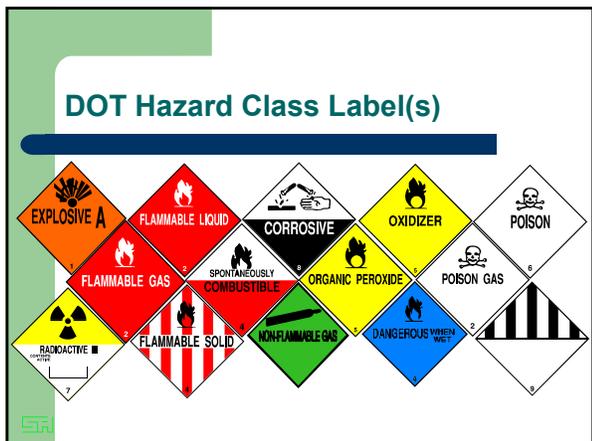
- Required
 - "Hazardous Waste" (Marking)
 - Hazard class
 - Certification
 - Arrow (labpack)
- Standard practice
 - Unique number
 - Generator name



HW Generator Label

- Generator
 - Name
 - Address
- Waste Info
 - Number
 - Description
 - Properties
 - Shipping name
- Manifest Document No. changes to Manifest Tracking Number 9/6/06
- ACCUMULATION START DATE**





Changes

- A provision to require that the word "overpack" be marked on overpacks to indicate that inside packages comply with prescribed specifications.

Overpack

≥ 01 / 2005

- The overpack is marked with a statement indicating that the inside (inner) packages comply with prescribed specifications when specification packagings are required, unless specification markings on the inside packages are visible.

INSIDE CONTAINERS COMPLY WITH PRESCRIBED REGULATIONS

Changes

< 01 / 2005

§ 173.25 Authorized packagings and overpacks.

(2) The overpack is marked with the proper shipping name and identification number, when applicable, and is labeled as required by this subchapter for each hazardous material contained therein, unless marking and labels representative of each hazardous material in the overpack are visible.

(4) The overpack is marked with a statement indicating that the inside (inner) packages comply with prescribed specifications when specification packagings are required, unless specification markings on the inside packages are visible.

≥ 01 / 2005

§ 173.25 Authorized packagings and overpacks.

(a) * * *

(2) The overpack is marked with the proper shipping name and identification number, when applicable, and is labeled as required by this subchapter for each hazardous material contained therein, unless marking and labels representative of each hazardous material in the overpack are visible.

(4) The overpack is marked with the word "OVERPACK" when specification packagings are required, unless specification markings on the inside packages are visible. Alternatively, until October 1, 2002, the overpack may be marked with a statement indicating that the "inside (inner) packages comply with prescribed specifications."

* * * * *

Overpack

- An enclosure that is used by a single consignor. An overpack provides protection or convenience in the handling of a package. It may consolidate two or more packages.

Overpack

- Examples of Overpacks are one or more packages:
 - Placed or stacked onto a load board such as a pallet and secured by strapping, shrink wrapping, stretch wrapping, or other suitable means; or



Overpack

- Examples of Overpacks are one or more packages:
 - Placed in a protective outer packaging such as a drum, box or crate.



Overpack

- The overpack is marked with the proper shipping name and identification number, and labeled as required by the HMR for each hazardous material contained therein unless markings and labels representative of each hazardous material in the overpack are visible.

Overpack

- Only Authorized Packages containing hazardous materials may be offered in an overpack if all of the following conditions are met:

Overpack

- The package meets the requirements of 173.21 and 173.24 of the HMR.

Overpack

- Each package subject to the orientation marking requirements of 172.312 is packed in the overpack with its filling holes up and the overpack is marked with package orientation marking arrows on two opposite vertical sides of the overpack with the arrows pointing in the correct direction of orientation.

Overpack



Changes

- Section 173.3 – Salvage Packaging
- This rule revised the requirements for use of salvage drums



Salvage Packaging

- Salvage packaging means a special packaging conforming to § 173.3 of this subchapter into which damaged, defective or leaking hazardous materials packages, or hazardous materials that have spilled or leaked, are placed for purposes of transport for recovery or disposal under the following conditions:

Salvage Packaging

- The salvage drum must be a UN 1A2, 1B2, 1N2 or 1H2 tested and marked for Packaging Group III or higher performance standards for liquids or solids and a leakproofness test of 20 kPa (3psi). The capacity of the drum may not exceed 119 gallons.

Salvage Packaging 49CFR Section 173.3

- “Note that a package found to be leaking prior to its being placed in transportation may not be packaged in a salvage drum. Instead, it must be repackaged into an authorized packaging in accordance with applicable HMR requirements.”*





Changes

- This rule revised the requirements for use of salvage drums:
 - To include packages of hazardous materials that are found not to conform with the requirements of the HMR
 - after the package has been offered for transportation.

Changes

- This rule change now allows for the placement of packages that did not meet UN specifications into a salvage container. Again, only after it is introduced for transportation.
- This is a change from the previous rule which did not allow for the placement of packages that did not meet UN specifications into a salvage container.

Changes

- Seemingly, the largest impact is that this rule change limits the use of a salvage drum to packages being discovered in improper packaging, leaking, damaged, or defective container after the packages have been placed in transportation.

Changes

Section 173.3 – Salvage Packaging –

From the Preamble to the new rule:

- *“Note that a package found to be leaking prior to its being placed in transportation may not be packaged in a salvage drum. Instead, it must be repackaged into an authorized packaging in accordance with applicable HMR requirements.”*

Exemptions/DOT Special Provisions

- DOT Issued
- Required to be the truck
- Listed on manifest
- Mark container
- Paint box exemption #11624

Modes of Transportation

- Truck (most common)
- Air
- Rail
- Ship



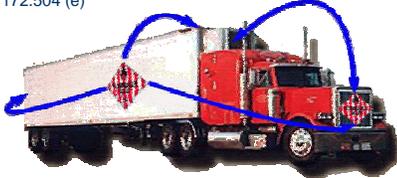

Hauler Certification

- Federal & California
- Registration
- EPA Identification Number
- Insurance
- BIT Inspection
- Driver Commercial endorsement
- *Hint: Verify Hauler on list*



Placards, Vehicles

- All four sides
- Placarding table
 - 49 CFR 172.504 (e)




Shipping Documents

- Uniform Hazardous Waste Manifest
 - & Continuation Sheets
- Nonhazardous Waste Manifest
- Bill of Lading
- Receipts
- Land Disposal Restrictions
- Waste Profile




Document Retention



- Minimum Regulatory requirement
 - Manifest = 3 year
 - Consolidated Manifest (Receipt) = 3 year
 - Nonhazardous = 375 days^a
 - Bill of Lading = 375 days^a
- *Reality*
 - *Keep forever*

a. Effective August 12, 2002



Preferred Shipping Documents

	Uniform Manifest	Nonhazardous Manifest	Bill of Lading
Hazardous Waste	✓		
Recyclable Hazardous	✓ (Antifreeze)	✓	✓
Universal		✓	✓

Note: Uniform Manifests can be used for nonhazardous shipments but the material is subject to the full recordkeeping requirements. Nonhazardous waste manifests are typically used for the convenience of the facility



Uniform Hazardous Waste Manifest

- Cradle-to-Grave Tracking
- U.S. DOT Shipping Paper
- Emergencies
- Tracking/Revenue
- Enforcement/Compliance
- Liability

Uniform Hazardous Waste Manifest

- Requirements
 - 40 CFR
 - Title 22
- Components
 - Federal
 - State
- Timeline
- Tracking

Format Changes Effective September 6, 2006



Now until 9/5/06

Manifest Components

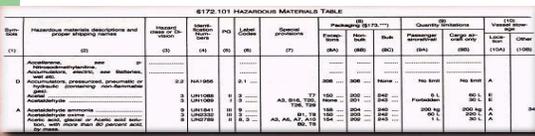
- California – gray shaded boxes
- Generator Information
- Transporter
- TSDF information
- Waste Information
- Emergency response number
- Signature
- *FILL IN ALL BLANKS (use leading zeros if needed)*

Generator EPA ID Number

- Federal or State
- "Site Specific"
- Obtain California number from DTSC (800) 618-6942
 - HHW = CAH
 - Load Checking = CAL (Public and private operations)
 - Permanent Federal = CAR, CAD
 - 90 day Temporary = CAC

Hazardous Material Table

- 49 CFR 172.101



11. US DOT Description

RQ	Shipping name	Contents	Hazard Class or Division	Identification Number	Packaging Group	Note	ERG Page #
	Corrosive liquids, n.o.s.	(Hydrochloric acid, Phosphoric acid)	8	UN1760	PG II		ERG(154)
RQ	Environmentally hazardous substance liquid, n.o.s.	(Captan, Carbaryl)	9	UN3082	PG III	RD+Captan	ERG(171)

Typical Descriptions

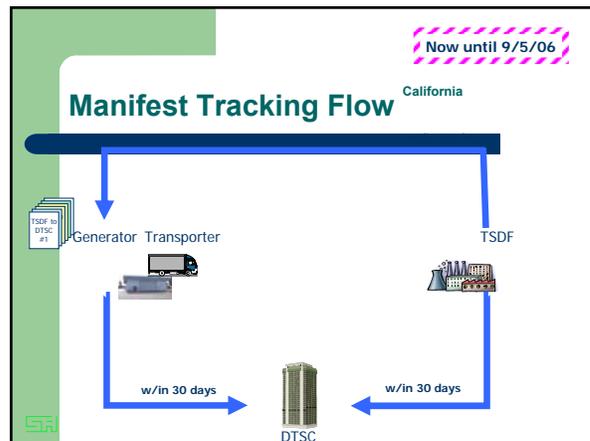
- Paint related material, 3, UN1263, PG III ERG#(127)
- Corrosive liquids, n.o.s., (Hydrochloric acid, Phosphoric acid), 8, UN1760, PG II, ERG#(154)
- Aerosols, flammable, (each not exceeding 1L capacity), 2.1, UN1950, (DOT-E-11396), ERG#(126)
- RQ Environmentally hazardous substances, N.O.S. (Acephate, Captan), 9 UN2929 PGIII ERG#(131) RQ=Capton
- RQ, Toxic liquid, flammable, organic, n.o.s., (Diazinon, Petroleum distillates), 6.1 (3)(3), UN2929, PG II, RQ=Diazinon, ERG#(131)
- **SEE INSERT**

Waste Codes

- HHW = 612
- Load checking = 612
 - If household-like and non-RCRA
- New Codes pending
 - HHW = 823 ?

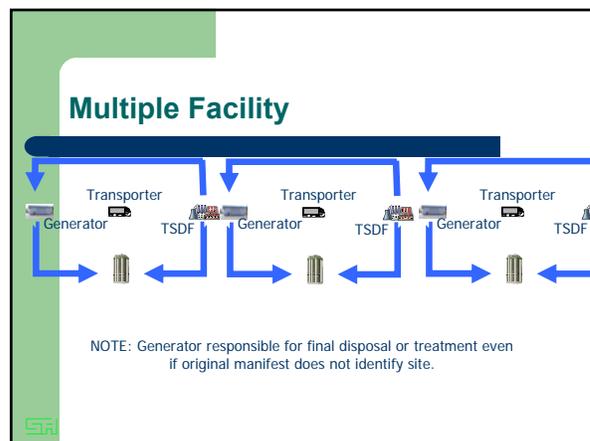
Generator Certification

- Box 16
 - "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations."



Manifest Timeline

- Generator to DTSC = 30 days
- TSDF to Generator = 30 days
- TSDF to DTSC = 30 days
- Generator notify DTSC
 - 15 days to resolve discrepancy after 30 day



Now until 9/5/06

Continuation Sheet

- Original, Return to Generator
- Transportation No. 1
- Transportation No. 2
- TSDf Copy
- Generator Copy
- File Copy or State Copy



Now until 9/5/06

Manifest/Continuation Match-up

- Manifest
 - TSDf to DTSC
 - Generator to DTSC
 - TSDf to Generator
 - Generator Retains
 - Hauler Retains
 - TSDf Retains
- Continuation Sheet
 - Original, Return to Gen
 - Transportation No. 1
 - Transportation No. 2
 - TSDf Copy
 - Generator Copy
 - File Copy or State Copy

Typical Distribution

Now until 9/5/06

Typical Copy Distribution

- Generator keeps
 - Manifest #4 & Continuation #5 (Generator Copy)
- Generator sends to DTSC
 - Manifest #2 & Continuation #3 (Transporter No. 2)
- Generator Receives
 - Manifest #3 & Continuation #1 (Original, Return to Generator)

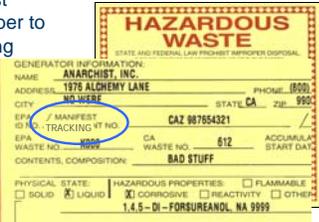
Current Manifest Problems

- Each state can print own version
- Each state require different information
- Not show destination facility address
- No emergency phone number box
- No consistent system for rejected loads or containers with residues

Effective 9/6/06

New Hazardous Waste Label Requirement

- Change Manifest Document Number to Manifest Tracking Number



Effective 9/6/06

New Manifest – Federal Mandate

- Immediately effective on loads shipped on September 6, 2006
- New manifest form and continuation sheet
- No state version allowed
- Manifest Tracking Number now 12 digits
- New boxes for
 - discrepancies,
 - load rejection, and
 - international shipments

New Manifest Requirements

- No "Generator to DTSC" copy
 - You need to copy and mail it (No address on form)
- Prohibits fractions and decimals
- No color coded manifest copies
- Private companies will print & sell manifests
 - NO approved sellers yet**
 - www.epa.gov/epaoswer/hazwaste/gener/manifest/register/index.htm

Uniform Hazardous Waste Manifest News Flash: New comment period until June 19, 2006

- New Manifest Form Required September 5, 2006
 - Forms 8700-22 and 22a (New continuation sheet also)
- Rule effective September 6, 2005
 - Immediately use new manifest form
- No State versions or instructions
- Designated Facility to Generating State
- No "Generator to DTSC" copy
 - You need to copy and mail it (No address on form)
- Private companies will print & sell manifests
- New fields for load rejection, imports/exports



Distribution, New Manifest

- Designated Facility to Destination State
If required
- Designated Facility to Generator State
If Required – NEW PAGE
- Designated Facility to Generator
- Designated Facility Copy
- Transporter Copy
- Generator's Initial Copy (bottom)

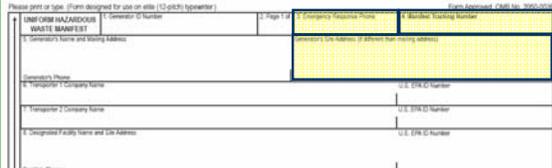
??? Missing Generator to Generator State

New Uniform Hazardous Waste Manifest

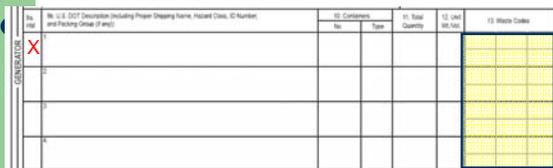
Effective 9/6/06



Generator Information



Waste Information



- Waste Codes
 - RCRA/Federal code(s) if applicable
 - Destination state code(s), if required
 - Generator state code(s), if required (E.g. HHW = 612)

Special Handling & Certification

Larger – Only custom space

Transporter

Designated Facility

Generator Preparation

- Be prepared to make copy & send to DTSC
 - DTSC
 - P.O. Box 400
 - Sacramento, CA 95812-0400
- Know alternative facility –Send rejected loads manifest copy to:
 - DTSC
 - P.O. Box 3000
 - Sacramento, CA 95812-3000

Rejected Loads

- Wastes may be returned from Destination Facility and under old or new manifest
 - Partial rejection requires new manifest
- Note discrepancies in Line 14
- Get rid of rejected waste in 90 days

Missing Hazardous Wastes of Concern

- Call DTSC's Complaint Hotline at 800-69-TOXIC (800-698-6942) within 24 hours of discovering that HWC is missing
- Provide the following:
 - 1) Generator name and identification number
 - 2) Transporter name, ID number, and, if available, transporter registration numbers
 - 3) Destination facility name and ID number
 - 4) Manifest number
 - 5) Waste information (lines 11-14 of the manifest), including
 - 6) Location or transportation routes where the HWC was first noticed missing
- Submit a written report with the above information, including resolution of the discrepancy or missing waste, within five days, to the appropriate DTSC address.

SEE DTSC FACT SHEET

Other Shipping Documents

- Non-California Uniform Hazardous Waste Manifest
- Consolidated manifest
- Nonhazardous manifest
- Bill of Lading



Non-California Manifests



- Non-California Manifest maybe required by receiving state
- Generator is responsible for ensuring copies distributed per California rules
 - Texas is most common and is only a four-part form
- Photocopy original to circulate



Exceptions

- Exceptions are allowed by DOT
 - Multiple hazard class in drum
 - Acid and cyanide on same truck
- Exemption number must be on manifest
- A copy must be on the truck



Consolidated Manifest

- SB 271, effective January 1, 2002
- Combine wastes from multiple generators
- Generator gets receipt
- Hauler completes manifest at end
- No TSDf verification to "Generator"
- EPA number required



Consolidated Manifest, Uses

- Used oil
- Antifreeze
- Asbestos
- Brake fluid
- School labpacks
- Solids contaminated with used oil



Nonhazardous Waste Manifest

- Similar to Uniform Hazardous Waste Manifest
- Preferred by some facilities
- Glorified bill of lading

The image shows a 'NON-HAZARDOUS WASTE MANIFEST' form. It includes sections for 'Generator Information', 'Waste Description', 'Transportation Information', and 'Receiver Information'. The form is a multi-part document used for tracking non-hazardous waste.



Bill of Lading

- Used for certain recyclable hazardous wastes, hazardous materials, and universal wastes, e.g.:
 - Fluorescent light tubes
 - Batteries, lead acid
 - Batteries, dry cell
 - Propane tanks
 - CRTs & E-waste



Bill of Lading

- Must be legible
 - Shipper – name, address, phone
 - Recipient – name, address, phone
 - Proper shipping name
 - Hazard class or division
 - ID number
 - Packing group
 - Emergency
 - Certification
- Retain 1 year – *Recommend forever*



Bill of Lading – Specifics

- Basic Description
 - e.g. 10 ctns, Paint, 3, UN1263, PG II, 225kg
- Certification
 - "I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packed, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national government regulations"

Waste Profiles

- Sometimes required by TSD/DF
- Identifies "regular" wastes from generator



Land Disposal Restrictions

- Required for certain wastes restricted from landfill
 - PCBs >50 ppm
 - Liquids with free cyanide >1000mg/l
 - Nonliquid non-RCRA hazardous wastes containing halogenated organic compounds (HOCs)
- Title 22, §66268.32.



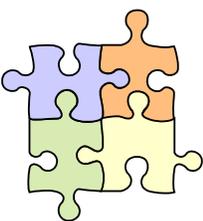
Hazardous Materials Safety

- Chemical hazards of wastes
 - PPE – gloves, eye protection, steel toe boots
 - Seal intact
- Physical hazards
 - Drum tilt
 - Fingers & toes pinched/crushed
 - Lifting
 - Loading
 - Vehicles



Putting It Together

- Your responsibility
- Items to review
- Pre-transport checklist
- Tracking




Your Responsibility

- Generator
- Hazmat Employer
- Shipper




Items to Review, Pre-transport

- Qualified hauler/truck
 - Driver hazmat endorsement
- Drums
 - Certified
 - Marking and Labeling
 - Quantity
- Shipping papers
 - Generator info
 - Waste description & codes




Tracking

- List & "Tickler" for dates

Ref.	Manifest Number	Transport Date from Generator	FSDF Receipt Date	Days Difference	Generation Location	Notes
35	20760048	3/8/2001	3/20/2001	12	PRHWCF	
36	18312	3/8/2001	OVERDUE	1872	PRHWCF	Label, no receipt
37	20760134	3/8/2001	4/4/2001	7	PRHWCF	
38	2333967	4/21/2001	8/2/2001	103	PRHWCF	
39	21088162	5/9/2001	OVERDUE	1810	PRHWCF	
40	21088210	5/16/2001	5/17/2001	1	PRHWCF	
41	21088262	5/23/2001	6/9/2001	13	PRHWCF	
42		5/23/2001	OVERDUE	1796		Propane, no receipt
43	21348087	10/16/2001	11/5/2001	20	PRHWCF	
44	244 8026226	10/19/2001	OVERDUE	1648	PRHWCF	Propane, no receipt
45	2191954	10/19/2001	OVERDUE	1647	PRHWCF	Thorium Nitrate shipped Missing Uranium Fluoride
46	21348122	10/22/2001	11/2/2001	11		
47	9000	10/25/2001	OVERDUE	1641	PRHWCF	Label, no receipt
48	21348138	10/25/2001	11/5/2001	11		



Review

- Purpose
- Training requirements
- Waste type
- Packaging & labeling
- Exercise - review manifests and shipping documents



DOT Hazardous Materials Transportation Refresher
Attachments

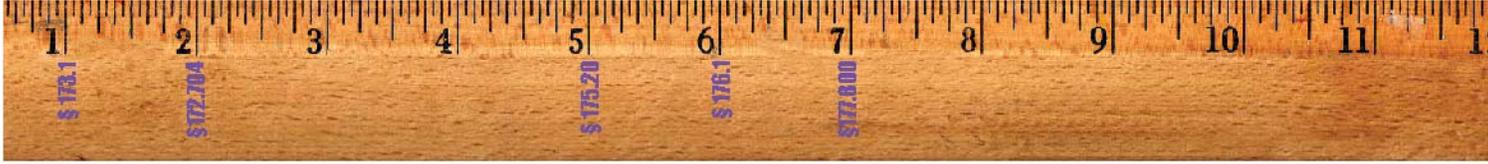
- Transportation of Hazardous Materials – Training FAQ
- Hazardous Materials Transportation Security Plan
- Office of Hazardous Materials Safety – Special Permits
- Special Permit, Transportation of certain waste paints and paint related materials, DOT-SP 11624
- Draft Summary of Federal Manifesting Requirements and Changes from Current Requirements
- Transportation Limits
- Shipping Document Descriptions

Most transportation incidents involving hazardous materials are the result of human error.

Training is the best means of preventing hazardous materials incidents.

Why Measure Up?

1. Heightens Employee Safety
2. Reduces Incidents and Accidents
3. Increases Employee Skills
4. Precludes Penalties
5. Reduces Operating Costs
6. Decreases Property Damage Costs
7. Increases Productivity
8. Increases Profits



Hazardous Materials



INFO-LINE
1-800-HMR49-22

Call our information line to obtain hazardous materials transportation information, copies of rulemakings and training materials. Specialists are on duty Monday through Friday from 9 a.m. to 4 p.m. Eastern time; however, you may call any time, 24 hours a day, seven days a week, and leave a message. We will return your call before the end of the next business day. You may use this number to report alleged violations of the Hazardous Materials Regulations.

Training Sources

Videos, CD-ROMs, training materials, fact sheets, newsletters, and other safety-related information are available from U.S. DOT.

View them or order on-line on the web at
<http://hazmat.dot.gov/pubs/pubs.htm>

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Hazardous Materials Initiatives and Training
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Awareness, Compliance and Enforcement Training

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U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration

DHM50-0028-0403

**DOES YOUR
HAZMAT
TRAINING
MEASURE UP?**



**Training
for the Safe
Transportation
of Hazardous
Materials**

The Federal hazardous materials transportation law (49 U.S.C. 5101 et seq.) is the basic statute pertaining to the transportation of hazardous materials (hazmat) in the United States. This law requires the training of ALL hazmat employees. The purposes are to increase a hazmat employee's safety awareness and to be an essential element in reducing hazmat incidents. The Hazardous Materials Regulations (HMR) include training requirements in several sections of Title 49 Code of Federal Regulations (CFR) as follows:

GENERAL	§ 173.1
SPECIFIC	§ 172.704
MODAL	§ 175.20
Air	§ 176.13
Vessel	§§ 177.80C, 177.81B
Highway	

Each hazmat employer must:

- train and test,
- certify, and
- 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).

Hazmat training must include:

- general awareness/familiarization;
- function-specific;
- safety;
- security awareness;
- **in-depth security training, if a security plan is required; and**
- driver training (for each hazmat employee who will operate a motor vehicle).

Frequency of training

Initial training - a new employee, or an employee who changes job functions, may perform hazmat job functions before completing training. **provided:**

- the employee does so under the direct supervision of a properly trained and knowledgeable hazmat employee, and
- the hazmat training is completed within 90 days of employment or change in job function.

Recurrent training is required at least once every three years. The three-year period begins on the actual date of training.

Relevant training received from a previous employer or source may be used to satisfy the requirements provided a current record of training is obtained from the previous employer or other sources. **Training conducted by OSHA, EPA, and other Federal or international agencies, may be used to satisfy the training requirements in 172.704(a) to the extent that such training addresses the training components specified in paragraph (a) of this section.**

Training records must include:

- hazmat employee's name;
- completion date of most recent training
- training materials (copy, description, or location);
- name and address of the hazmat trainer; and
- certification that the hazmat employee has been trained and tested.

DEFINITIONS

TRAINING means a systematic program (consistent approach, testing, and documentation) that ensures that a hazmat employee has knowledge of hazardous materials and the HMR, and can perform assigned hazmat functions properly. See § 172.700 through § 172.704.

HAZMAT EMPLOYER means a person who uses one or more employees in connection with:

- transporting hazmat in commerce;
- causing hazmat to be transported or shipped in commerce; or
- representing, marking, certifying, selling, offering, reconditioning, testing, repairing, or modifying packagings as qualified for use in the transportation of hazmat.

The term "hazmat employer" also includes any department, agency, or instrumentality of the United States, a State, a political subdivision of a State, or an Indian tribe engaged in offering or transporting hazmat in commerce. **This term includes an owner-operator of a motor vehicle which transports hazardous materials in commerce.**

HAZMAT EMPLOYEE means a person who is employed by a hazmat employer and who directly affects hazmat transportation safety including:

- an owner-operator of a motor vehicle which transports hazmat;
- a person (including a self-employed person) who:
 - loads, unloads, or handles hazmat;
 - tests, reconditions, repairs, modifies, marks, or otherwise represents packagings as qualified for use in the transportation of hazmat;
 - prepares hazmat for transportation;
 - is responsible for safety of transporting hazmat; or
 - operates a vehicle used to transport hazmat.

FREQUENTLY ASKED QUESTIONS

May hazmat employers/employees train and test themselves (an owner-operator)?

Yes, self-training is acceptable provided that all training requirements of § 172.704 are met.

Who certifies that an instructor is qualified to train, test, and certify in accordance with § 172.704?

Except for certain FAA required 14 CFR training, the U.S. DOT does not review or certify training programs for pre-approval purposes. The employer must determine a trainer's qualifications based on the employer's need.

Does the trainer who teaches and tests the hazmat employee certify that the hazmat employee is trained and tested?

It is the hazmat employer's responsibility to ensure that a hazmat employee is properly trained and tested; however, the hazmat employer may designate an outside source to train, test, and certify on his/her behalf that the employee has been trained and tested.

If a designated outside source trains but does not test the employee, must the employee be tested to complete this training?

Yes. The employee must be tested in order for the training to meet the requirements of the HMR. The hazmat employer is responsible for ensuring each hazmat employee is trained and tested.

Must the test be in a written format or may a skill demonstration be used?
Any test that ensures that the employee can perform the assigned duties in compliance with the HMR is acceptable. Training and testing may be accomplished in a variety of ways: performance, written, verbal, or a combination of these.

Must the employee "pass" a test?

The requirements do not state that the employee must "pass" a test; however, an employee may only be certified in areas in which he/she can successfully perform his/her hazmat duties.

Does IMDG Code, ICAO Technical Instructions, OSHA or EPA training fulfill the HMR requirements?

This training may be used to the extent that the general awareness, function-specific, safety, and security training and testing requirements of the HMR are met. Areas not covered will require additional training.

Who will enforce the training requirements in § 172.704?

Enforcement pertaining to carriers is the responsibility of each U.S. DOT modal administration. Compliance or noncompliance with the training rule will be determined during safety and compliance reviews of shippers and carriers.

What type of fines would be involved?

A violation of any hazardous materials regulation, including training, may result in a civil penalty of up to \$32,500 for each violation and, in certain cases, criminal penalties of up to \$500,000 and imprisonment of up to 5 years. See § 107.329 and § 107.333.

An office secretary types the required hazardous materials description on a shipping paper at the direction of another item by item. Is the secretary a hazmat employee requiring training?

Yes, each person who performs any function subject to the HMR must be trained, except special circumstances addressed by § 172.704(e).

Do the hazmat training regulations apply to foreign flag vessels carrying hazardous materials?

Yes, the regulations apply to each non-bulk domestic and foreign vessel while operating in the navigable waters of the United States.

Do the hazmat training regulations apply to hazmat employers and/or employees who operate a bulk vessel transporting hazardous materials?

No. Except for transportation in bulk packagings, the bulk carriage of hazardous materials by water is governed by 46 CFR Chapter I, Subchapter D, I, N, and O. See 49 CFR § 176.5(d).

Is a shipmaster a hazmat employer?

No, the shipmaster is a hazmat employee; the operator of the vessel is the hazmat employer.

Do the hazmat training regulations apply to employees working with materials that are consumer commodities?

Yes.

Does a Commercial Driver's License (CDL) with HM/tank vehicle endorsement satisfy requirements?

A hazmat employer must determine applicability of CDL to the specific functions the employee performs and provide training for functions not covered by the endorsement.

HAZARDOUS MATERIALS TRANSPORTATION SECURITY PLAN

SCOPE:

This plan is developed to meet the requirements in section 800-802 of Title 49 of the Code of Federal Regulations (CFR). Section 800 of Part 172 of CFR 49 outlines requirements for development and implementation of a plan to address security risks related to the transportation of hazardous materials in commerce.

This plan also meets the requirements addressed in the United States Department Of Transportation (DOT) Research and Special Programs Administration for: Facility Security Checklist, Security Checklist for the Carrier of Hazardous Materials, Security Checklist for the Receiver of Hazardous Materials and Checklist for the Shipper of Hazardous Materials.

APPLICABILITY:

This Plan applies to San Bernardino County Household Hazardous Waste (HHW) Program. This organization consists of a network of HHW collection facilities that collect HHW from county residents. The main facility, referred to as the Central Facility, is located at 2824 East "W" Street, San Bernardino, CA 92415-0799. Waste generated by Conditionally Exempt Small Quantity Generators (CESQG) is accepted from qualified small businesses only at this site. Program staff transports placarded waste, in accordance with subpart F of CFR 49, from satellite facilities and small businesses, to the Central Facility.

SECURITY PLAN:

PERSONNEL SECURITY:

All job applicants are screened for employment by San Bernardino County Fire Department, Human Resources Division. All staff that is required to transport hazardous materials received a minimum of 24-hour Hazardous Waste Operation and Emergency Response (HAZWOPER) training in accordance with CFR 29, 1910.120 and CCR 8, 5192. They also received a minimum of 8-hours DOT initial and refresher training as required by CFR 29, section 172-704 et sec.

UNAUTHORIZED ACCESS:

The HHW facility is enclosed by fence and all entrances and exits gates are closed and locked at the close of business each operating day and on weekends. All materials are stored in approved DOT containers. Only trained HHW staff has access to the waste handling areas of the facility. The public and vendors are not allowed in these areas unless escorted by trained HHW staff. Only authorized HHW employees are engaged in the transportation of any hazardous materials from this site to any Treatment Storage and Disposal Facility (TSDF).

Contractor employees and subcontractors from selected hazardous waste management companies are screened for identity purposes before any amount of material is signed over to them for transportation to TSDFs.

Because the facility is located on the San Bernardino International Airport; the site is monitored by airport security on nights and on weekends.

EN ROUTE SECURITY:

All program vehicles that are used in the transportation of placarded hazardous materials are equipped with radio communication equipment and all program staff is assigned mobile telephones. HHW staff is not allowed to pick up passengers or to stop for personal reasons during the transportation of hazardous materials. However, they are allowed to stop and provide emergency assistance, to the best of their abilities and training, should the need arise. Staff is trained to park vehicles in accordance with CFR 49 in the event that they need to break for meals during the transportation of hazardous materials. They are trained to report any and all unusual activities to the program supervisor and law enforcement officers.

TRAINING:

All authorized employees who handle hazardous materials have been trained in accordance with the requirements of CFR 29, 1910.120, CCR 8, 5192 and CFR 49. All employees working within the scope of this plan will receive initial training on this plan and annual refresher training thereafter. The refresher training will reflect any and all modifications of this plan.

RESPONSIBILITY:

The responsible employee for this plan is Ionie Wallace, Supervising Hazardous Materials Specialist. This plan was implemented on March 28, 2006.

Office of Hazardous Materials Safety – Special Permits

Q. When did the term “exemptions” change to “special permits”?

A. The Hazardous Materials Safety and Security Reauthorization Action of 2005, signed August 10, 2005, amended the Federal hazardous materials transportation law (49 U.S.C. 5101 *et seq.*) by revising certain terminology, definitions, and requirements. PHMSA incorporated these changes into its regulations (49 CFR Parts 105-107 and Parts 171-180) under Docket HM-240 (70 FR 73156), which was published as a final rule on December 9, 2005.

<http://hazmat.dot.gov/regs/rules/final/70fr/docs/70fr-73156.pdf>

Q. Will DOT immediately reissue all exemptions as special permits?

A. No. Current exemptions are valid until they expire, are terminated, or become due for renewal. As each exemption is revised either by renewal, adding a party, or modifying its terms, the exemption will be reissued as a special permit. We anticipate completion of this process in about 2 years.

Q. May I start using the “SP” marking on packages or shipping papers even though my authorization is still an exemption?

A. Yes. It is understood that the “E” and “SP” markings mean the same thing.

Q. What documentation do I need to use my special permit?

A. A special permit authorization consists of the special permit authorization letter issued to the grantee together with the special permit document itself.

Q. May I use a special permit indefinitely?

A. A new special permit may not exceed 2 years. Subsequent renewal applications may be granted for up to four years. A person requesting party status is authorized for no more than two years with a renewal cycle every four years thereafter. Existing exemptions that are converted to special permits with no change in the terms of the exemption will be granted for four years.

Q. May I continue to offer packages that are marked “DOT-E***” rather than “DOT-SP***”?

A. The final rule published under Docket HM-240 49 CFR 173.23 to authorize an exemption packaging that is permanently marked “DOT-E” prior to October 1, 2007, to continue in use with the “DOT-E” marking for the life of that exemption packaging, so long as the terms of the exemption or special permit remain valid.

Q. May I continue to use shipping papers with the notation “DOT-E***” rather than “DOT-SP***”?

A. Section 172.203 requires a shipping paper for a shipment made under a special permit to include the notation “DOT-SP” followed by the special permit number assigned. As an alternative, shipping papers for shipments made under an exemption or special permit issued prior to October 1, 2007, may include the notation “DOT-E” instead of “DOT-SP” followed by the number assigned. Thus, a shipper may use either notation for shipments made under an exemption or special permit issued prior to October 1, 2007.

Q. Is it a violation to offer or transport packages where the package may be marked “DOT-E” and the shipping papers marked “DOT-SP” or visa versa?

A. No, there is no violation. The provisions in 49 CFR 172.203 and 173.23 allow for such transportation.

November 10, 2005



U.S. Department
of Transportation

400 Seventh Street, S.W.
Washington, D.C. 20590

**Pipeline and
Hazardous Materials
Safety Administration**

DOT-SP 11624
(ELEVENTH REVISION)

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: (See individual authorization letter)
2. PURPOSE AND LIMITATION:
 - a. This special permit authorizes the transportation in commerce of certain waste paints and paint related materials, Class 3, in 5 gallon pails, packed in cubic yard boxes, dump trailers, and roll-off containers. This special permit provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein.
 - b. The safety analyses performed in development of this special permit only considered the hazards and risks associated with transportation in commerce.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR §§ 173.173(b)(2) and 173.242 in that inner metal or plastic packagings of not over 5 gallons packed in cubic yard boxes, dump trailers and roll-off containers are not authorized, except as specified herein; § 172.301(a) in that each inner packaging is not marked with the proper shipping name and identification number; § 172.301(c) in that each inner packaging is not marked with the special permit number; and § 172.400(a) in that each inner packaging is not labeled.
5. BASIS: This special permit is based on the application of Safety-Kleen Systems dated August 31, 2004, submitted in accordance with § 107.109.

November 10, 2005

6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Proper Shipping Name/ Hazardous Materials Description	Hazard Class/ Division	Identi- fication Number	Packing Group
Paint (preceded by the word "Waste" if applicable)	3	UN1263	II and III
Paint related material (preceded by the word "Waste" if applicable)	3	UN1263	II and III

7. SAFETY CONTROL MEASURES:

a. PACKAGING - Inner metal or plastic packagings of not over 5 gallons each, packed in cubic yard boxes, dump trailers, and roll-off containers. The cubic yard boxes, dump trailers, and roll-off containers must be liquid tight through design or by the use of plastic lining materials.

b. OPERATIONAL CONTROLS -

(i) All packagings inside cubic yard boxes, dump trailers and roll-off containers must be blocked and braced to prevent movement during transportation that could cause the container to open or fall over.

(ii) No leaking containers may be transported under the terms of this special permit, unless overpacked in a UN specification package capable of containing the leakage or in accordance with § 173.12.

c. Only waste materials may be transported under the terms of this special permit.

8. SPECIAL PROVISIONS:

a. A person who is not a holder of this special permit who receives a package covered by this special permit may reoffer it for transportation provided no modifications or changes are made to the package and it is reoffered for transportation in conformance with this special permit and the HMR.

- b. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.
- c. MARKING - The outside of each yard box, dump trailer and roll-off container must be plainly and durably marked with "DOT-SP 11624" at least 2 inches in height. Alternatively, each yard box, dump trailer and roll-off container may remain marked "DOT-E 11624" until October 31, 2006, provided the special permit remains valid.
- d. The marking requirements for each inner packaging in accordance with § 172.301(a) and § 172.301(c) are waived.
- e. LABELING - The labeling of each inner packaging in accordance with § 172.400(a) is waived.
- f. Shipping papers displaying "DOT-E 11624" may continue to be used until October 31, 2006, provided the special permit remains valid.
9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle, rail freight and cargo vessel.
10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each cargo vessel or motor vehicle used to transport packages covered by this special permit.
11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:
- o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
 - o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
 - o Registration required by § 107.601 et seq., when applicable.

November 10, 2005

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)- 'The Hazardous Materials Safety and Security Reauthorization Act of 2005' (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term 'exemption' to 'special permit' and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. REPORTING REQUIREMENTS: Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:



for Robert A. McGuire
Associate Administrator for
Hazardous Materials Safety

November 10, 2005

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Materials Safety Administration, Department of Transportation, Washington, D.C. 20590. Attention: PHH-31.

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at http://hazmat.dot.gov/sp_app/special_permits/spec_perm_index.htm Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO:KFW/sln

4/14/2006

Company Name City / State	Application Date	Issue Date	Expiration Date
21st Century EMI of Fernley, NV Fernley, NV	Oct 01, 2004	Oct 26, 2004	May 31, 2006
21st Century Environmental Management, Inc. of RI (21 EMI) Providence, RI	Aug 03, 2004	Aug 24, 2004	May 31, 2006
21st Century Environmental Management, Inc. of RI Providence, RI	Mar 28, 2006	Apr 05, 2006	Mar 31, 2010
ADCOM Express, Inc. Vista, CA	Jul 02, 2004	Jul 28, 2004	May 31, 2006
Advanced Chemical Transport, Inc. San Jose, CA	Jul 06, 2004	Jul 28, 2004	May 31, 2006
AET Environmental, Inc. Denver, CO	Mar 01, 2006	Apr 04, 2006	Feb 28, 2010
Alchemist Transport, Inc. Langley, BC U.S. Agent: Truck Process Agents of America, Inc. Madison, SD	Jul 28, 2004	Aug 10, 2004	May 31, 2006
American Chemical & Environmental, Inc. dba AmeriChem Chula Vista, CA	Jun 17, 2004	Jul 28, 2004	May 31, 2006
American Haz-Mat Middle Island, NY	Nov 11, 2004	Dec 10, 2004	May 31, 2006
Arch Chemicals, Inc. Norwalk, CT	Sep 01, 2004	Oct 26, 2004	May 31, 2006
Ashland Distribution Company Freedom, PA	Mar 30, 2004	Jun 07, 2004	May 31, 2006
Barnes HazMat Pacoima, CA	Jan 31, 2006	Feb 24, 2006	Jan 31, 2010
Bay West, Inc. St. Paul, MN	Jun 30, 2004	Jul 28, 2004	May 31, 2006

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Company Name City / State	Application Date	Issue Date	Expiration Date
Bed Rock, Inc. dba Tri-State Motor Transit Company Joplin, MO	Aug 10, 2004	Nov 02, 2004	May 31, 2006
Belshire Environmental Services, Inc. Lake Forest, CA	Jul 20, 2005	Aug 31, 2005	May 31, 2006
Burlington Environmental Inc. Kent, WA	Oct 01, 2004	Oct 26, 2004	May 31, 2006
Care Environmental Corp. Landing, NJ	Apr 06, 2006	Apr 14, 2006	Mar 31, 2010
Carson Dorn, Inc. Juneau, AK	Jan 05, 2006	Feb 06, 2006	Dec 31, 2009
Chem-Freight, Inc. Toledo, OH	Feb 25, 2004	Jul 09, 2004	May 31, 2006
Chemical & Hazmat Technologies (CHMT) San Francisco, CA	Oct 26, 2004	Nov 03, 2004	May 31, 2006
Chemical Disposal Services, Inc. Gary, IN	Jun 10, 2004	Jul 09, 2004	May 31, 2006
Chemical Pollution Control, Inc. of New York Bay Shore, NY	Aug 24, 2004	Sep 14, 2004	May 31, 2006
Chemical Transportation Inc. Rillito, AZ	Feb 11, 2004	Jul 09, 2004	May 31, 2006
CHMT San Francisco, CA	Oct 21, 2004	Nov 02, 2004	May 31, 2006
Clark Environmental, Inc. Ft. Pierce, FL	Feb 01, 2006	Feb 24, 2006	Jan 31, 2010
Clean Harbors Environmental Services, Inc. Braintree, MA	Feb 28, 2006	Mar 13, 2006	Feb 28, 2010
Clean Venture, Inc. Elizabeth, NJ U.S. Agent: Branch Manager Elizabeth, NJ	Aug 11, 2004	Sep 14, 2004	May 31, 2006

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Company Name City / State	Application Date	Issue Date	Expiration Date
Coal City Cob Company, Inc. Avalon, TX	Sep 27, 2004	Oct 26, 2004	May 31, 2006
Dart Trucking Company, Inc. Canfield, OH	Mar 05, 2004	Jul 09, 2004	May 31, 2006
Disposal Consultant Services, Inc. Hillsborough, NJ	Jul 14, 2004	Aug 10, 2004	May 31, 2006
Duratek Federal Services, Inc. Richland, WA	Mar 23, 2006	Apr 04, 2006	Feb 28, 2010
ECOFLO, Inc. Greensboro, NC	Feb 13, 2006	Mar 13, 2006	Feb 28, 2010
Ecology Control Industries Torrance, CA	Mar 17, 2006	Apr 05, 2006	Mar 31, 2010
Eldredge, Inc. The West Chester, PA	Jul 22, 2004	Aug 10, 2004	May 31, 2006
Eldredge, Inc. West Chester, PA	Feb 27, 2006	Apr 04, 2006	Feb 28, 2010
Ensco Caribe, Inc. Bo. Palmas, Catano, PR	Apr 06, 2006	Apr 11, 2006	Mar 31, 2010
Ensco Caribe, Inc. San Juan, PR	Sep 29, 2004	Oct 26, 2004	May 31, 2006
Environmental Products & Services of Vermont, Inc. Burlington, VT	Apr 06, 2006	Apr 11, 2006	Mar 31, 2010
Environmental Response, Inc. Tempe, AZ	Apr 23, 2004	Jun 07, 2004	May 31, 2006
Environmental Strategies & Technologies (formerly Effective Environmental Solutions) Detroit, MI	May 09, 2005	May 31, 2005	May 31, 2006
Environmental Transport Group, Inc. Flanders, NJ	Jan 31, 2006	Feb 24, 2006	Jan 31, 2010
Enviro-Safe Corporation Sandwich, MA	May 10, 2005	May 31, 2005	May 31, 2006

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Company Name City / State	Application Date	Issue Date	Expiration Date
Envirosolve, L.L.C. Tulsa, OK	Nov 26, 2004	Dec 10, 2004	May 31, 2006
Envirotech Systems, Inc. Lynnwood, WA	Feb 09, 2005	Feb 24, 2006	Jan 31, 2010
EOG Environmental, Inc. Milwaukee, WI	Jun 16, 2004	Jul 09, 2004	May 31, 2006
EQ Industrial Services, Inc. (formerly EQ Northeast, Inc.) Ypsilanti, MI	Aug 11, 2004	Sep 14, 2004	May 31, 2006
EQ Industrial Services, Inc. Ypsilanti, MI	Mar 01, 2006	Mar 13, 2006	Feb 28, 2010
EQ Northeast, Inc. Wrentham, MA	Jun 08, 2005	Jul 26, 2005	May 31, 2006
Evergreen Environmental Services - North (DBA Evergreen Environmental Services) Newark, CA	Sep 01, 2004	Sep 29, 2004	May 31, 2006
Frank's Vacuum Truck Service Inc. Niagra Falls, NY	Aug 11, 2004	Aug 24, 2004	May 31, 2006
Freehold Cartage, Inc. Freehold, NJ	Aug 12, 2004	Sep 14, 2004	May 31, 2006
General Environmental Management, Inc. Pomona, CA	Sep 13, 2004	Sep 29, 2004	May 31, 2006
Global Environmental Services Group, LLC Honolulu, HI	Aug 23, 2004	Sep 29, 2004	May 31, 2006
Greenleaf Treatment Services, LLC	May 07, 2004	Jun 07, 2004	May 31, 2006
H.M.H.T.T.C Response Team, Inc. Parsippany, NJ	Jul 28, 2004	Aug 24, 2004	May 31, 2006
Hazardous Waste Transportation Services, Inc. Santa Fe Springs, CA	Apr 10, 2006	Apr 14, 2006	Mar 31, 2010

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Company Name City / State	Application Date	Issue Date	Expiration Date
HazMat Environmental Group, Inc. Buffalo, NY	Mar 31, 2006	Apr 14, 2006	Mar 31, 2010
HazMat Services, Inc. Anaheim, CA	Jun 02, 2004	Jul 09, 2004	May 31, 2006
Heritage Transport, LLC Indianapolis, IN	Feb 02, 2006	Feb 24, 2006	Jan 31, 2010
M P Environmental Services, Inc. Bakersfield, CA	Feb 07, 2006	Feb 24, 2006	Jan 31, 2010
Marisol, Inc. Bound Brook, NJ	Jul 08, 2004	Jul 28, 2004	May 31, 2006
Maumee Express, Inc. (MXI) Somerville, NJ	Dec 15, 2004	Jan 13, 2005	May 31, 2006
New England Disposal Technologies, Inc. Shrewsbury, MA	Mar 22, 2006	Apr 11, 2006	Mar 31, 2010
North State Environmental So. San Francisco, CA	Aug 13, 2004	Sep 14, 2004	May 31, 2006
Northland Environmental, Inc. (Northland) Providence, RI	Mar 28, 2006	Apr 05, 2006	Mar 31, 2010
Nortru, Inc., Transportation Group Detroit, MI U.S. Agent: Nortru, Inc. Detroit, MI	Sep 23, 2004	Oct 26, 2004	May 31, 2006
NuWay Industrial Services, Inc. Lexington, SC	Jun 18, 2004	Jul 28, 2004	May 31, 2006
Onyx Environmental Services, L.L.C Flanders, NJ	Mar 08, 2006	Apr 04, 2006	Feb 28, 2010
OP-TECH Environmental Services, Inc. Syracuse, NY	Nov 01, 2005	Nov 23, 2005	Oct 31, 2007
OSI Environmental, Inc. Eveleth, MN	Aug 20, 2004	Sep 14, 2004	May 31, 2006

4/14/2006

Company Name City / State	Application Date	Issue Date	Expiration Date
Pacific Commercial Services, LLC Honolulu, HI	Feb 17, 2006	Feb 24, 2006	Jan 31, 2010
Pacific Environmental Corporation dba Penco Honolulu, HI	Mar 08, 2004	Jul 09, 2004	May 31, 2006
Pacific Trans Environmental Services, Inc. (PTES) El Cajon, CA	Jan 28, 2005	Mar 16, 2005	May 31, 2006
Pacific Trans Environmental Services, Inc. El Cajon, CA	Dec 29, 2005	Feb 06, 2006	Dec 31, 2009
Perma-Fix Government Services Honolulu, HI	Nov 09, 2005	Nov 10, 2005	Oct 31, 2009
Perma-Fix of Orlando, Inc. Orlando, FL	May 10, 2004	Jun 07, 2004	May 31, 2006
Philip Enterprises, Inc. Delta, BC	Oct 01, 2004	Oct 26, 2004	May 31, 2006
Philip Environmental Services Corporation (A division of Philips Services Corporation) Phoenix, AZ	Nov 11, 2004	Nov 30, 2004	May 31, 2006
Philip Reclamation Services Houston, Inc. Houston, TX	Jan 10, 2006	Feb 06, 2006	Dec 31, 2009
Philip Transportation & Remediation, Inc. (formerly Allwaste) Phoenix, AZ	Aug 24, 2004	Sep 29, 2004	May 31, 2006
Photo Waste Recycling Co., Inc. San Rafael, CA	Oct 12, 2005	Nov 10, 2005	Oct 31, 2009

4/14/2006

Company Name City / State	Application Date	Issue Date	Expiration Date
Pollution Control Industries of Tennessee LLC Millington, TN U.S. Agent: Pollution Control Industries East Chicago, IN	Nov 10, 2005	Feb 06, 2006	Dec 31, 2009
Pollution Control Industries, Inc. (PCI) East Chicago, IN	Nov 10, 2005	Feb 06, 2006	Dec 31, 2009
Precision Industrial Maintenance, Inc. Schenectady, NY	Feb 10, 2006	Feb 24, 2006	Jan 31, 2010
PSC Industrial Outsourcing, Inc. Kapolei, HI	Oct 01, 2004	Oct 26, 2004	May 31, 2006
R3 Environmental Management, Inc. Elgin, IL	May 20, 2004	Jul 09, 2004	May 31, 2006
Rebec LLC Lynnwood, WA	Sep 07, 2004	Oct 26, 2004	May 31, 2006
Republic Environmental Systems (Transportation Group), Inc. Hatfield, PA	Mar 28, 2006	Apr 05, 2006	Mar 31, 2010
Resource Recovery Corporation Tacoma, WA	Oct 01, 2004	Oct 26, 2004	May 31, 2006
Responsive Environmental Solutions New Braunfels, TX	May 10, 2005	Jun 14, 2005	May 31, 2006
Rho-Chem Corporation Inglewood, CA	Oct 01, 2004	Oct 26, 2004	May 31, 2006
Rineco Chemical Industries, Inc. Benton, AR	Mar 16, 2006	Apr 05, 2006	Mar 31, 2010
Robbie D. Wood, Inc. Dolomite, AL	Mar 09, 2006	Apr 04, 2006	Feb 28, 2010
Romic Environmental Technologies Corporation East Palo Alto, CA	Feb 28, 2006	Apr 04, 2006	Feb 28, 2010

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Company Name City / State	Application Date	Issue Date	Expiration Date
Safety-Kleen Canada, Inc. Brampton, ON	Mar 16, 2006	Apr 04, 2006	Feb 28, 2010
Safety-Kleen Canada, Inc. Plano, TX	Sep 01, 2004	Sep 29, 2004	May 31, 2006
Safety-Kleen EnviroSystems Company of Puerto Rico, Inc. Plano, TX	Mar 14, 2006	Apr 04, 2006	Feb 28, 2010
Safety-Kleen Systems, Inc. Plano, TX	Mar 14, 2006	Apr 04, 2006	Feb 28, 2010
San Bernardino County Fire Department San Bernardino, CA	Feb 16, 2006	Feb 24, 2006	Jan 31, 2010
SET Environmental, Inc. Wheeling, IL	Mar 01, 2006	Mar 13, 2006	Feb 28, 2010
S-J Transportation Co., Inc. form. S-J Trans. Co. Woodstown, NJ	Nov 22, 2004	Dec 10, 2004	May 31, 2006
SLT Express Way, Inc. Tolleson, AZ	Mar 22, 2004	Jul 09, 2004	May 31, 2006
Smith Systems Transportation, Inc. Scottsbluff, NE	Mar 01, 2006	Apr 04, 2006	Feb 28, 2010
Special Waste Disposal, Inc. Blaine, MN	Mar 05, 2006	Apr 04, 2006	Feb 28, 2010
Special Waste Disposal, Inc. Minneapolis, MN	Jul 28, 2004	Aug 10, 2004	May 31, 2006
STAT, Inc. Lenoir, NC	Feb 16, 2006	Feb 24, 2006	Jan 31, 2010
Sturgeon & Son, Inc. Bakersfield, CA	Sep 22, 2004	Oct 26, 2004	May 31, 2006
Teris LLC (formerly Teris LLC dba Heat Treatment Service) El Dorado, AR	Feb 15, 2006	Feb 24, 2006	Jan 31, 2010

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Company Name City / State	Application Date	Issue Date	Expiration Date
Teris LLC (formerly Teris LLC dba Heat Treatment Service) Dallas, TX	Jul 16, 2004	Aug 10, 2004	May 31, 2006
The University of Minnesota Minneapolis, MN	Mar 08, 2006	Apr 04, 2006	Feb 28, 2010
Triad Transport, Inc. McAlester, OK	Mar 03, 2006	Apr 04, 2006	Feb 28, 2010
United Eagle Transportation Dale City, CA	Mar 14, 2006	Apr 04, 2006	Feb 28, 2010
Univar USA Inc. Seattle, WA	Feb 28, 2006	Apr 04, 2006	Feb 28, 2010
Univar USA, Inc. Seattle, WA	Jun 30, 2004	Jul 28, 2004	May 31, 2006
University of California, San Diego La Jolla, CA	Sep 08, 2004	Sep 29, 2004	May 31, 2006
Von Roll America, Inc. East Liverpool, OH	Nov 17, 2005	Dec 21, 2005	Nov 30, 2009
Waste Management N.E.E.T. Inc. Portland, CT	May 09, 2005	Jun 06, 2005	May 31, 2006
Weavertown Transport Leasing, Inc. McDonald, PA	Sep 27, 2004	Oct 26, 2004	May 31, 2006

Draft Summary of Federal Manifesting Requirements and Changes from Current Requirements

General	<ul style="list-style-type: none"> • Uniform Hazardous Waste Manifest required for most shipments of federally regulated RCRA waste. Change: Only one version can be used anywhere in the nation. States banned from creating own versions. Some new fields are added including: generator site address, import/export, discrepancy categories, rejected loads, and alternate facility. The new form is printed on white paper. Previous colors used on the California form are banned. • States were allowed to print their own instructions on manifests including state waste codes, mailing addresses for manifests, and other state information. Change: States cannot include instructions on the national manifest and must develop other ways to provide that information. • Shipments rejected by a receiving facility or containers with residues must be properly managed. Change: New manifest has space for load rejection information (cause, destination, receipt date, alternate facility, and reference to other manifest if used.) Time periods are set for retention time by TSDf (60 days) and generators (same as accumulation time.) • States may require submission of manifests. Change: States where the generator is located may also require submission of manifests by TSDf in a different receiving state. • Some states collected handling codes on manifests. Change: EPA requires use of the Biennial Report Hazardous Waste Management Report Method Codes by all TSDf on all manifests. • Manifests are printed by States and some private printers. Change: The new manifest must be used on and after September 5, 2006. It may only be printed by registered sources approved by US EPA. <p><i>For U.S. EPA Information: www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/index.htm and www.epa.gov/epaoswer/hazwaste/gener/manifest/index.htm</i></p>
Generators	<ul style="list-style-type: none"> • Generators are responsible for accurately completing the manifest and signing the waste minimization certification. Change: The certification is moved to the regulations. "Offerers" who prepare waste for shipment per US DOT may sign manifests for the generator, such as transporters, contractors, or TSDf rejecting waste. • Waste could be rejected back to the Generator. Change: Generators receiving rejected waste or containers with residue are required to sign the manifest and note discrepancies. There is a time limit for holding the waste before shipping it off. U.S. EPA allows whatever accumulation time applies to the generator (90/180/270 days). • The California manifest form had a page for generators to submit to the State. Change: U.S. EPA dropped that page so generators in states that require submission of a manifest, must submit a legible photocopy.
Transporters	<ul style="list-style-type: none"> • Import/Export information was required on the manifest. Change: A section is added for this information and for the transporter to sign off on exports.
TSDf	<ul style="list-style-type: none"> • TSDf identified discrepancies on manifests. Change: The manifest form provides five types of check boxes for discrepancies in addition to a narrative field. • Rejected loads could be sent to the generator or an alternate facility. Change: Procedures require use of a new manifest in many cases, limit holding time of rejected waste, and require TSDf to link old and new manifests by manifest numbers. • Some containers and bulk containers held a residue after removing waste. Change: TSDf are obligated to determine if a container holds a residue that exceeds the definition of an empty container. TSDf must manifest non-empty containers to the generator or an alternate facility and link the manifests by manifest numbers. • TSDf submit manifests to their state, if so required. Change: Federal regulations now require TSDf to submit manifests to their state and the generator's state as well, if so required by that state.

How Is California More Stringent Than U.S. EPA Regarding Manifesting?

General	<ul style="list-style-type: none"> • CA regulates more waste as hazardous and requires manifests for most RCRA and Non-RCRA HW, except for most UW and E Waste, and small silver shipments. • CA collects manifests for all CA generators, plus imports and exports passing through CA . • CA collects all manifests for shipments to CA TSDFs. • CA collects manifests for all waste generated in CA that is shipped to facilities in other states and exports.
Generators	<ul style="list-style-type: none"> • CA requires all generators to obtain ID numbers and does not exempt CESQGs. • CA requires manifests for all RCRA and CA waste shipped in CA, includes shipments for reclamation or recycling that are exempt under U.S. EPA. • CA requires submission by the generator of a manifest copy as signed by the generator and first transporter. The new forms will not have a printed page for this purpose, so CA will require generators to submit a photocopy. • Certain generators are allowed to ship RCRA exempt shipments on a consolidated manifest collected and managed by a consolidated transporter. • Retention time for rejected waste or container residues is limited to 90 days. U.S. EPA allows whatever accumulation time applies to the generator (90/180/270 days). • Instructions are provided for generators to describe on manifests Non-RCRA wastes that do not have a DOT shipping name.
Transporters	<ul style="list-style-type: none"> • All transporters operating in CA must register annually and provide proof of insurance. Transporters handling Hazardous Waste of Concern (HWC) are subject to fingerprinting and background checks. • Transporters consolidating waste for eligible generators are responsible for that waste if it is rejected by a TSDF. These transporters are limited to a 10 day holding period on their property after rejection. • Transporters currently must submit manifest copies when taking non-RCRA waste to facilities in other states. CA is considering dropping this requirement.
TSDFs	<ul style="list-style-type: none"> • More facilities are permitted in CA including transfer facilities that transfer bulk waste or open or consolidate containerized waste. • Holding time for rejected waste and container residue is limited by permit conditions and holding time is limited to 10 days in receiving areas that are not authorized by the permit to store waste and limited to being held in a truck or vehicle. Residue determination is based on CA empty, not fed empty. • Additional discrepancy reporting by TSDFs is required if the waste is a HWC (call in report within 24 hours and written report in 5 days)

2/24/06

Transportation limits*

This guidance provides the regulatory and statutory limits on transportation of household hazardous waste that can be transported without a hazardous waste manifest.*

Material	Quantity	HSC (a) Title 22	Limits/Notes
General	Maximum 5 gallons or 50 pounds (HH or CESQG to TSDF)	HSC 25163 (c)	<ul style="list-style-type: none"> Does not accumulate > 1,000 kg onsite at any one time.
Public agency Authorization	15 gallons AND 125 pounds	HSC 25218.5.1	<ul style="list-style-type: none"> Adequate public education on proper packaging and transporting
Variance			<ul style="list-style-type: none"> Formal approval required by DTSC.
Specific Materials			
Latex Paint	Unlimited, if recyclable	HSC 25217	<ul style="list-style-type: none"> Bill of lading required Must be transferred for recycling. Business plan EPA ID Number
Lead acid batteries	Maximum 10 batteries at one time	Title 22, CCR 66266.81 (a)(1)	
Used Oil	Maximum 55 gallons, container maximum 55 gallons	HSC 25250.11	<ul style="list-style-type: none"> Transporter has generated the oil Prior verification that facility will accept the oil Certified center may limit amount
	Maximum 20 gallons, container maximum 5 gallons	HSC 25250.11	<ul style="list-style-type: none"> Prior verification of acceptance by facility not required
Used Oil Filters via Curbside HHW Collection (including solid waste hauler collection)	Maximum collected from residents 10 pounds used oil filters	HSC 25218.1 (b), Title 22, CCR 66266.130	<ul style="list-style-type: none"> HW hauler not required Must be transported to storage facility, scrap processor, smelter, or solid waste incinerator that recycles the casings Requires bill of lading Only transport properly drained filters Containers must be tightly-sealed and well-secured Store less than one ton
Mercury, elemental	10 pounds or less	Title 22, CCR 66266.120	<ul style="list-style-type: none"> Must be transported to a resource recovery facility for recovery Allowed for non-generator
Universal Waste <ul style="list-style-type: none"> HH Batteries Thermostats Lamps CRTs CEDS Aerosol cans Mercury thermometers Mercury motor vehicle switches Other mercury wastes 	Unlimited	T22,CCR 66273, HSC 25201.16	<ul style="list-style-type: none"> Must become a universal waste transporter Must comply with federal (49CFR) hazardous material transportation, if applicable Prohibited from disposing, treating, or diluting the waste, except for responding to releases Prior approval required if sent to another universal waste handler.

Transportation limits*

Material	Quantity	HSC (a) Title 22	Limits/Notes
Curbside HHW Collection	Maximum collected from residents <ul style="list-style-type: none"> • 10 pounds used oil filters and small batteries • 5 gallons used oil • 5 gallons latex paint • Universal Wastes <ul style="list-style-type: none"> ○ Fluorescent light tubes (<4ft.) ○ Mercury wastes (pack special) 	HSC 25218.5 (d)	<ul style="list-style-type: none"> • No lead acid batteries or antifreeze
Recycle Only	<ul style="list-style-type: none"> • Total volume of latex paint, used oil filters, antifreeze, and small batteries not exceed 10 gallons or 100 pounds • Also 2 lead-acid batteries • 20 gal used oil, container <5 gal 	HSC 25218.5 (c)	No other HHW accepted
SW hauler	<ul style="list-style-type: none"> • Unknown 	HSC 25163 (e)	Hazardous waste hauler registration is not required for “Any person authorized to collect solid waste, as defined in Section 40191 of the Public Resources Code, who unknowingly transports hazardous waste to a solid waste facility, as defined in Section 40194 of the Public Resources Code, incidental to the collection of solid waste”.

(a) HSC – California Health and Safety Code <http://www.leginfo.ca.gov/calaw.html>
 Title 22 – California Code of Regulations www.calregs.com

*This guidance was compiled by Sweetser & Associates. Users should verify the information with regulatory agencies prior to implementation to ensure compliance. Sweetser & Associates does not retain any liability for use of this information.

UNIFORM HAZARDOUS WASTE MANIFEST - Descriptions

RQ	Hazardous materials descriptions and proper shipping name	Contents [List will vary]	Hazard Class or Division	Identification Number	Packing Group	Other Note	ERG Page
	Aerosols, flammable, (each not exceeding 1L capacity)		2.1	UN1950	---	(DOT-E-11396)	ERG#(126)
	Aerosols, poison, (each not exceeding 1L capacity)	(Aerosol Pesticides, Carbon Dioxide)	2.2	UN1950	---		ERG#(126)
RQ	Asbestos		9	NA2212	PG III		ERG#(171)
	Batteries dry, containing potassium hydroxide solid, electric storage		8	UN3028	PG III		ERG#(154)
	Carbon dioxide		2.2	UN1013			ERG#(120)
	Caustic alkali liquids, n.o.s.	(sodium hydroxide, Trisodium phosphate)	8	UN1719	PG II		ERG#(154)
	Corrosive liquids, n.o.s.	(Hydrochloric acid, Phosphoric acid)	8	UN1760	PG II		ERG#(154)
RQ	Environmentally hazardous substance liquid, n.o.s.	(Cadmium, Captan)	9	UN3077	PG III		ERG#(171)
RQ	Environmentally hazardous substance liquid, n.o.s.	(Captan, Carbaryl)	9	UN3082	PG III	RQ=Captan	ERG#(171)
RQ	Environmentally hazardous substances, N.O.S.	(Acephate, Captan)	9	UN2929	PG III	RQ=Captan	ERG#(131)
	Flammable liquids, n.o.s.	(Xylene, Toluene)	3	UN1993	PG II		ERG#(128)
	Flammable liquids, Toxic, n.o.s.	(Petroleum distillates, Diazinon)	3 (6)	UN1992	PG II	RQ=Diazinon	ERG#(131)
RQ	Flammable solid, organic, n.o.s.	(Fuses, Metaldehyde)	4.1	UN1325	PG II	RQ=Metaldehyde	ERG#(133)
	Flammable solid, organic, n.o.s.	(Roof tar, Adhesives)	4.1	UN1325	PG II		ERG#(133)
	Mercury		8	UN2809	PG III		ERG#(172)
	Nitric acid		8	UN2031	PG II		ERG#(157)
	Non-RCRA Hazardous waste, liquid	(Antifreeze)			---		ERG#(NA)
	Non-RCRA Hazardous waste, liquid	(Ethylene glycol, water)			---		ERG#(NA)
	Non-RCRA Hazardous waste, liquid	(Latex paint)			---		ERG#(NA)
	Non-RCRA Hazardous waste, liquid	(Oil Filters)			---		ERG#(NA)
	Non-RCRA Hazardous waste, liquid	(Oily water)			---		ERG#(NA)
	Organic peroxide type E, liquid	(Methyl Ethyl Ketone Peroxide, Benzoyl Peroxide)	5.2	UN3107	PG II		ERG#(145)
	Oxidizing liquid, n.o.s.	(Potassium nitrate, Sodium nitrate)	5.1	UN3139	PG II		ERG#(140)
	Oxidizing liquid, n.o.s.	(Sodium hypochlorite, Sodium nitrate)	5.1	UN3139	PG II		ERG#(140)
	Paint related material		3	UN1263	PG II	(DOT-E 11624)	ERG#(127)
	Paint related material		3	UN1263	PG II		ERG#(127)
RQ	Pesticides, Solid, Toxic, n.o.s.	(Pyrethains, Chlordane)	5.1	UN2088	PG II		ERG#(131)
	Polychlorinated Biphenyls		9	UN2315	PG II		ERG#(171)
	Propane		2.1	UN1978	---		ERG#(115)
	Thorium Nitrate, Solid		7	UN2976	---		ERG#(162)
RQ	Toxic liquid, flammable, organic, n.o.s.	(Diazinon, Petroleum distillates)	6.1 (3)(3)	UN2929	PG II	RQ=Diazinon	ERG#(131)
RQ	Toxic solids Organic, n.o.s.	(Diazinon, Carbaryl)	6.1	UN2811	PG II	RQ=Diazinon	ERG#(154)
RQ	Toxic solids Organic, n.o.s.	(Diazinon, Chlordane)	6.1	UN2929	PG II	RQ=1	ERG#(121)
	Waste, Toxic solids, Organic, n.o.s.		6.1	UN2811	PG II	RQ=Diazinon	ERG#(154)

BILL OF LADING AND NONHAZARDOUS WASTE MANIFEST - Descriptions

RQ	Hazardous materials descriptions and proper shipping name	Contents [List will vary]	Hazard Class or Division	Identification Number	Packing Group	Other Note	ERG Page
	Batteries wet filled with acid		8	UN2794	PG III	Corrosive	ERG#(154)
	Butane		2.1	UN1011			ERG#(115)
	Excluded Recyclable Material	(Bulk, Latex Paint)					
	Excluded Recyclable Material	(Loose Pack, Latex Paint)					
	Propane		2.1	UN1978			ERG#(115)
	E-Waste/CRTs for Recycle						