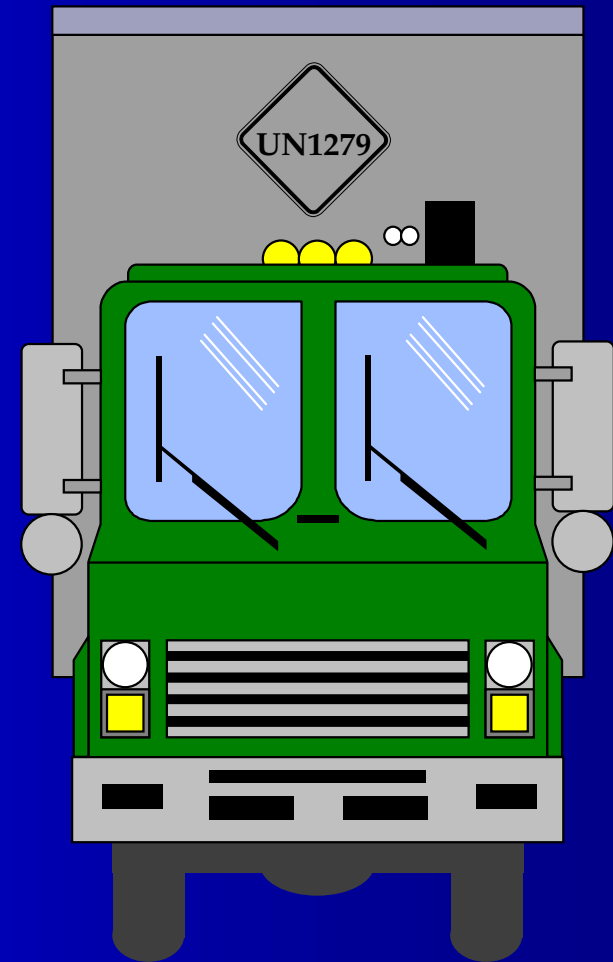
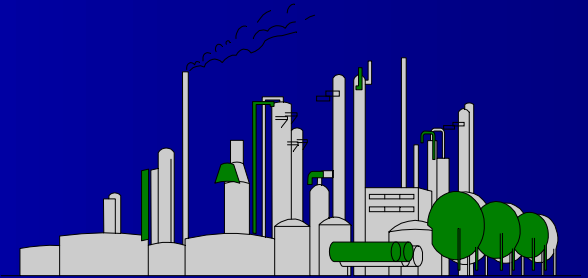
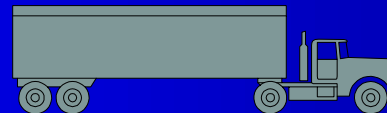
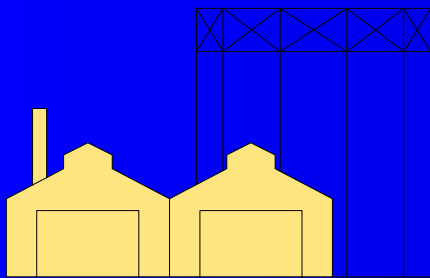


Hazardous Waste Transportation



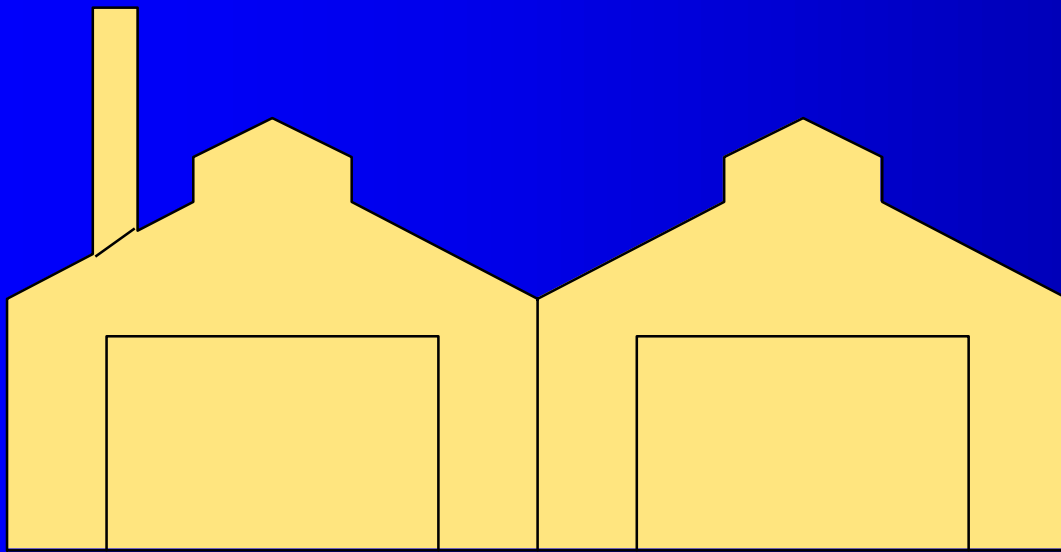
“Cradle-to-Grave” Management



Generator

Transporter

What responsibilities apply to *generators* shipping hazardous waste?



Pretransport Regulations

- Pretransport regulations apply to generators shipping waste *off-site* or treatment, storage, and disposal facilities (TSDFs) transporting hazardous waste.
- The pretransport regulations cover:
 - Packaging
 - Labeling
 - Placarding
 - Marking
 - Waste accumulation
- DOT, EPA, and NRC all regulate portions of the hazardous waste pretransport requirements

Responsibilities for Pretransport Include DOT Requirements

- 40 CFR 262.30 - Packaging
- 40 CFR 262.31 - Labeling
- 40 CFR 262.32 - Marking
- 40 CFR 262.33 - Placarding

Packaging

- Before transporting or offering hazardous waste for transportation off-site, the generator must package the waste in accordance with the applicable DOT regulations under 49 CFR 173, 178, and 179.
- DOE Order also requires compliance with NRC packaging requirements in 10 CFR 71.



Labeling

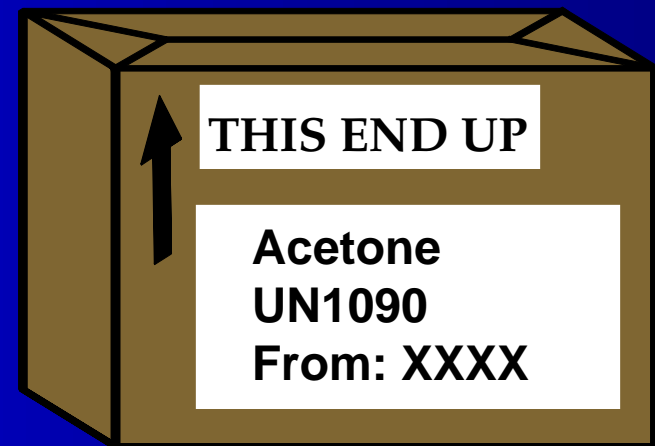


“Before transporting or offering hazardous waste for transportation off-site, a generator must label each package in accordance with the applicable [DOT] regulations on hazardous materials under 49 CFR Part 172.”



Marking

Markings are warning devices, instructions, and information applied to individual packages to alert package handlers and transporters about potential hazards.



Placards

- Placards are applied to vehicles or freight containers with hazardous cargo.
- Placards provide necessary hazard information to transportation workers and emergency response personnel.
- Generators must make placards available to the transporter.



How do I track off-site shipments of hazardous waste?



The Uniform Hazardous Waste Manifest

- Provides DOT information on hazards, which may be required in the event of a transportation accident.
- Provides hazardous waste tracking and accountability.
- Required on public highways *unless* transport is within or along the border of contiguous property.

The Uniform Hazardous Waste Manifest (Continued)

- Includes:
 - Name and EPA ID numbers of generator, transporter(s), and TSDF(s);
 - DOT description of the waste being transported;
 - Quantities of waste being transported; and
 - Address of the TSDF (a.k.a. the ‘designated facility’).

Taking A Closer Look: U.S. DOT Description Components

Preparing a manifest includes identifying:

- Proper shipping name
- Hazard class or division
- DOT Identification Number
- Packing group
- Reportable quantity

Waste Minimization Certification: Another Important Element On The Manifest

- All large quantity generators must certify on the hazardous waste manifests that they have a waste minimization program in place.
- Small quantity generators must certify that they have made a good faith effort to minimize their waste generation.
- EPA has developed interim final guidance to assist generators in determining what elements should be in programs.

Acquisition of the Manifest

A generator who transports, or offers for transportation . . . must prepare a manifest.

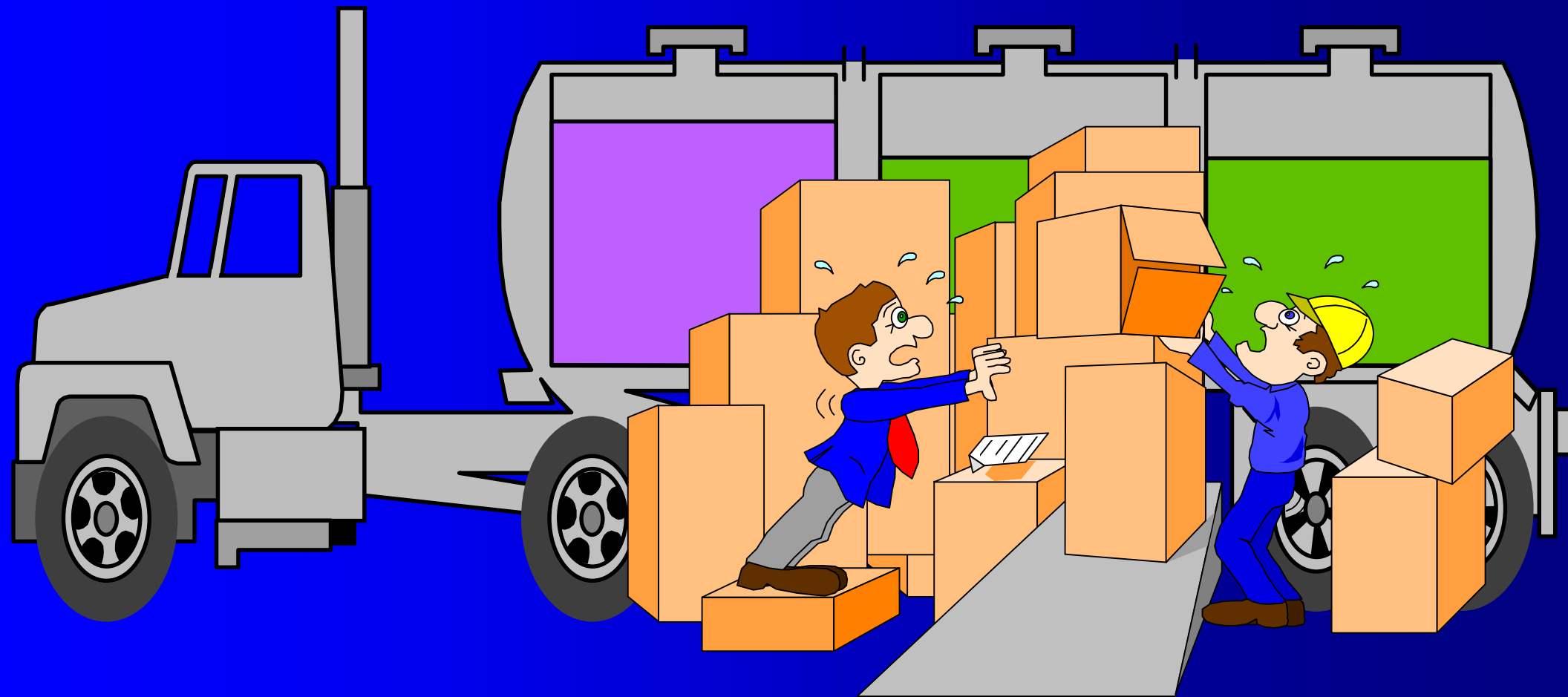
Are there any
exceptions to
manifest
requirements?



Universal Waste Handlers Must:

- Reduced requirements for certain waste termed “universal wastes” including:
 - batteries
 - pesticides
 - thermostats
- Comply with applicable DOT requirements
- Track universal waste shipments
- Maintain records

What responsibilities fall on the transporter?



Transporter Responsibilities in 40 CFR 263

- 40 CFR 263.10 excludes on-site transport from the scope of these requirements.
- Transporters must have EPA identification numbers (40 CFR 263.11).
- Transporters must comply with manifest and recordkeeping requirements established in 40 CFR 263 Subpart B.

Transporter Responsibilities For Discharge Of Hazardous Waste Include:

- Taking appropriate immediate action to protect human health and the environment such as notifying authorities and providing containment of the discharge area.
- Removing waste without a generator identification number and transporting without a manifest, if approved by a responsible agency.
- Providing notices of releases.
- Cleaning up discharged hazardous waste until Federal, State, or local officials determine cleanup is adequate.

RCRA/DOT Partnership In Transportation Accountability

- RCRA ensures accountability for wastes transported by requiring:
 - use of the hazardous waste manifest,
 - EPA identification number for transport, and
 - coordination with DOT requirements.
- DOT imposes requirements for adequate packaging, labeling, placarding, and shipping information that minimize the potential for releases during transport and ensure adequate response to releases that might occur.

