

PREPARING HAZARDOUS MATERIALS OR WASTE FOR SHIPMENT

Many fabricators overlook the fact that they are governed by Department of Transportation (DOT) regulations whenever they ship off hazardous waste or transfer a drum of resin from one facility to another one -- even if it is just across the street. A brief overview is provided -- more detailed requirements can only be determined when the commodity to be shipped has been properly identified.

Training: Each employee involved in the shipment of hazardous materials, be it preparing the shipping paper or hazardous waste manifest to packaging and labeling the drum, must be trained on DOT requirements at least every three years.

Preparing Shipping Papers: All hazardous materials or waste must be correctly identified on the shipping paper. The DOT requires that all materials be properly identified according to descriptions from their Hazardous Materials Table. At a minimum, shipping papers or manifests must include:

- Shipper's name and address
- Consignee's name and address
- Basic description: Shipping name, hazard class, ID number, packing group -- in that exact order
- Weights and volume
- Total quantity, type and kind of package
- Emergency response information
- 24-hour emergency response telephone number
- Shipper's declaration -- stating that everything meets DOT requirements
- Page numbers
- Title and signatures

Emergency Response Information: The following information must accompany the shipping paper:

- Basic description and chemical names
- Immediate health hazards
- Risks of fire or explosion
- Immediate precautions to take in the event of an accident or incident
- Immediate methods for handling spills or leaks
- Preliminary first aid measures

This information can be provided by attaching an MSDS or ensuring that the transporter has a copy of the Emergency Response Guidebook.

Many facilities use Chemtrec's phone number -- this number is only allowed to be used if you have registered with them!! You must ensure that the phone number on the paper will enable emergency responders to immediately access someone with a good understanding of the hazardous material being shipped and emergency procedures.

Properly Pack and Prepare Containers for Transport: All containers must meet the DOT's Performance Oriented Packaging standards (POPs). Packaging must be embossed with the proper UN code according to what is being shipped.

Properly Mark and Label Containers: All containers must be labeled with an approved hazard class label (4" x 4" diamond), proper shipping name, identification number and the shipper and consignee's name and address.

Shipping and Placarding: Any hazardous materials shipment weighing more than 1,000 lbs. in aggregate weight may only be hauled by a driver with a CDL license that contains a hazardous materials endorsement. The vehicle must be placarded on all four sides identifying the hazardous materials being carried.

Excellent overviews of the requirements and training material on Hazardous Materials Safety can be located at <http://hazmat.dot.gov/training.htm>.

HAZARDOUS MATERIALS REGISTRATION PROGRAM

As of July 1, 2000, the DOT has required anyone who offers a single shipment containing 1,000 lbs. or more of one or more classes of hazardous materials or hazardous wastes that require placarding to register with the DOT. Most Small Quantity Generators are going to be covered by this DOT program due to the fact that their Acetone waste stream often weighs more than 1,000 lbs. when it is being shipped off-site. The EPA's Hazardous Waste Manifest is the shipping paper which will indicate whether your facility should have registered or not.

- The registration year is July 1 to June 30 for each filing year.
- The annual registration fee for years beginning with 2003 – 2004 is \$150 for each facility meeting the Small Business Administration's size standard for a small business and \$300 for each facility that does not meet those standards.
- Copies of the registration statement and the certificate of registration must be kept for three years at your principal place of business and must be available for inspection.
- The requirement to register with DOT is based on a federal law. Federal, state, or local officials may impose penalties for failing to register or failing to meet the recordkeeping requirements.
- If you have failed to register in the past, you must file a registration statement and pay the appropriate fee for each year for which you need to register.

The DOT has an easy on-line registration system. This can be accessed at <http://hazmat.dot.gov/register.htm>. Questions about the Hazardous Materials Regulations can also be called into the Hazardous Materials Information Center at 800/467-4922.

Please call the Composites One's Department of Health, Safety & Environment at 800/621-8003 for more detailed information on DOT requirements.

HAZARDOUS MATERIALS TRANSPORTATION SECURITY

Anyone who offers or transports a single shipment containing 1,000 lbs. or more of one or more classes of hazardous materials or hazardous wastes that require placarding must have a security plan in place by September 25, 2003.

The security plan must include an assessment of possible transportation security risks for shipments and appropriate measures to address the assessed risks. At a minimum, the plan must include the following elements:

- **Personnel Security.** Measures to confirm information provided by job applicants hired for positions that involve access to and handling of the hazardous materials covered by the security plan.
- **Unauthorized Access.** Measures to address the assessed risk that unauthorized persons may gain access to the hazardous materials covered by the security plan.
- **En Route Security.** Measures to address the assessed security risks of shipments of hazardous materials covered by the security plan.

The security plan must be in writing and be retained for as long as it remains in effect. Copies of the plan must be available to employees who are responsible for implementing it. The plan must be revised and updated to reflect changing circumstances.

Security Awareness Training: No later than the date of the first scheduled recurrent required hazmat employee training after March 25, 2003 (no later than March 24, 2006) must now include training that provides an awareness of security risks associated with hazmat transportation and methods designed to enhance transportation security. There must also be a component covering how to recognize and respond to possible security threats. New employees must be trained within 90 days after employment.

In-depth Security Training: By December 22, 2003, each hazmat employee must be trained concerning the security plan and its implementation. Security training must include:

- Company security objectives
- Specific security procedures
- Employee responsibilities
- Actions to take in the event of a security breach
- Organizational security structure

Guidelines and training material may be found on the DOT's website at **http://hazmat.dot.gov/hmt_security.htm**.