

# **In-Depth Manifest Training**





23rd California Unified Program Annual
Training Conference
February 2 – March 18, 2021

- 3:00 p.m. 4:00 p.m. PST
- Thursday, February 25
- **±** Add to Calendar

#### (H-2/25) IN DEPTH MANIFEST TRAINING



Added to MyAgenda

Tracks: H, Industry



**OBJECTIVE:** Learn all about the manifest, including both DOT and EPA rules for properly executing the manifest, plus the most common violations.

**DESCRIPTION:** Approximately 50% of all manifests have mistakes on them that could lead to violations for your site. In this class we will learn how to properly fill out a Uniform Hazardous Waste Manifest, including the necessary DOT regulations. We will also learn how to create a DOT basic description and proper shipping name for both RCRA and non-RCRA hazardous waste, plus identify the most common mistakes and how to avoid them.



Primary Presenter

Regan Bottomley

Consultant

Environmental Resource Ctr



#### Introduction

- > Andy Smith
- More than 20 years training/consulting
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  - · 800-537-2372 x 236







### Learning Objectives (all in 45 minutes!)

- > Learn how to properly execute a manifest
- Understand the necessary DOT rules required for the manifest
- Learn how to construct a DOT proper shipping name for RCRA and non-RCRA hazardous waste
- Identify the most common mistakes and how to avoid them





### Question for chat box

> I'm a Luddite, don't know how to use the polls, so a simple yes or no in the chat box will have to suffice...

- Did you attend Daniels (Daniel's?) Manifest training on 2/11?
- > Are you going to attend CERCLA and Manifest RQs on 3/3?
- > Are you going to attend HW Manifest Issues on 3/18?





### Question for chat box

- > If no, we're going over it here. You're in luck.
- > If yes...wow, you must LOVE talking about the manifest.





Where can you find the manifest instructions?

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- Where can you find the manifest instructions?
  - In California, Appendix in 22 CCR 66262

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- Where can you find the manifest instructions?
  - Federally (and possibly after CA adopts new rules) no longer in regulations

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- Where can you find the manifest instructions?
  - Emanifest system
  - Back of paper manifests

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  - Same information, just filled out online



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ı	7. Transporter 2 Company Nam	•					U.S. EPA.O	Number			
	8. Designated Facility Name at	d Site Address					USBAD	Number			
ı	Facility's Phone						1				
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DE SIGNATED FACE ITY	Facility's Phone 15c. Signature of Alternate Facil	By (or Seresstor)							Marih	City	No.
SSC	15 Hazardous Waste Report M	anagement Wethod Codes (i.e., codes to	ir hazardous waste treatment, dis	posal, and re	lycling systems)		14.			_	
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ı	20. Designated Facility Owner of	P Operator: Certification of receipt of his	ardous materials covered by the	nanifest exce	pt as noted in flor	15a	_				
ļ	PirtedTyped Name			Signature					More	Day	100
	4 From \$200, 55 (0) 12 17	Previous address are obsolete.		_						_	_



### Waste Examples from Previous Session

> 4 drums of alcohols and iocane



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l	7. Transporter 2 Company Non	*					U.S. EPA.D	Number		
l	8. Designated Facility Name of	d Sile Address					US BAID	Number		
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ı	So. 9b. U.S. DOT Descript and Packing Group (F.	on (including Proper Stopping Name, H My)	lacard Class, ID Number,		10 Cortai No.	Type	11. Total Quantity	12 Unit VR,No.	13. Waste Code	
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### Plus...

> 1 drum of a non-RCRA HW that is a DOT hazardous material



ase print or type.									Form	Amount	CHE No.	2050-0030
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7. Transporter 2 Company No	rne							U.S. EPA.D	Number			
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marked and statements and	anded, and an in all and in all a	equate paper continued to the continued	to transport association for the state of th	ng to agift.  Authorised and by print from 1 Supplements Supplement Supplements Supplement	uste returns sequent of the sequent	donal and nat Consert. (df) an a small Part of ent Date leaves	verify pr	Perter Re	is f export shy	Wij No.	an the Pool	potos





#### Plus...

> 1 drum of a non-RCRA HW that is NOT a DOT hazardous

material



١	uniform HAZARDOUS	1. Generator D Number		2.Page 1 of	3. Emergency Response	Phone	4. Marrilesi	Form Tracking No.		
	WASTE MANIFEST	VATEST000004		1						
	Lemman s From E. Narapolar I Congany Nan	va.an.e22			Senerator's Sile Address	7 Shout N				
							U.S. EPA.O			
	7. Transporter 2 Company Nam	•					U.S. EPA.D	Number		
	Designated Facility Name an	d Sile Address					U3 84.0	Number		
	Facility's Phone	on (Including Proper Shipping Nam	and the state of the state of		10 Contai	-	11. Total			
Į	So. 99. U.S. DOT Descripts and Packing Group (Fa	on (molularly Proper Shipping hair Pyl)	ne, materil Cless, ID Number,		No.	Type	TI. Total Quantity	12 Unit WR/NOL	13.1	Nacle Codes
										-
	2.									
	1				-					+
	<b>-</b>									
	14. Special Handling Instruction	s and Additional Information								
	15. GENERATOR'S OFFERO marked and labeled places Exporter, I certify that the I certify that the weate min	R'S CERTIFICATION: Thereby di ded, and are in all respects in pro- priately differ consignment conf- mission abstracts distributed in 4	per condition for transport according to the latents of the atlantee	ording to applica of EPAAcknowle propartity game	able international and nat adgment of Consent, rator) or (b) (F) an a sm	brai governo	ertal regulations	ngoing name . If export sh	and are class preset and I a	ofel, pedagel in the Prinary
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	15. GENERATOR SOFFERO marked and labeled/place. Exporter, I cently that the I cently that the waste min Generator's Offeror's Pinted Ty.  15. International Shipments	R'S CERTIFICATION: Thereby of ded, and are in all respects in proceedings of the contents of the consequence content deathful in 40 ped Name  I import to U.S.	per condition for transport accions to the terms of the attaches of CFR 262-27(a) (F) am a large	ording to applica of EPAAcknowle propartity game	able international and not obsprient of Consent, rator) or (b) (F) an a sno observe (B) Port of entr	oral government govern	ertal regulations	reping name . Ferport sh	, and are class great and I a	offed, pechaged in the Primary B Day
	GENERATOR'S OFFERO method and labeled place. Report. Confly that the Land's place he washe mid-Sementar's Offero's Printed Tyle.     Transporter September 50 responses to transporter separatury for expo	RECERTFICATION: Thereby do flot, and are in all engages in providing of the consignment confusion distinct direction of distinct direction of distinct direction of the consignment confusion in the confusion of	per condition for transport accions to the terms of the attaches of CFR 262-27(a) (F) am a large	ording to applica d EPA.Acknowle properties game Sign	able informational and not edgment of Consent, rator) or (b) (IT) am a sma oture	oral government govern	ertal regulations	apping name. If export sh	and are class general and I a	offed, packaged on the Primary B Day
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	15. GENERATOR'S OFFERO merked and labeled places. Exporter. Lord that the Licentify that the Licentify that the waste min Generation's Offeron's Protecting 15th International Dispersional Engineering Licentification and Licent	RS CERTIFICATION: I hereby do del and see a di respectio i più contra d'i the compandi i più contra d'i the compandi contra di	per condition for transport accions to the terms of the attaches of CFR 262-27(a) (F) am a large	ording to applica d EPAAchonele in quantity pone Sign Export from to	oble intermetional and not objected of Consent, rotato, or (b) (F1 am a smo obline (S. Port of entr Date leaves	oral government govern	ertal regulations	report of	and are class great and I a	offed, packaged in the Primary
	15. GENERATOR'S OFFERO marked and labeled places. Exported, 10mm of place to 1 and 5 place the seals min Committee Offeror's Printed Top Committee Offeror's Printed Top Top States of the sepondary 17. Transporter Astronal	RS CERTIFICATION: I hereby do del and see a di respectio i più contra d'i the compandi i più contra d'i the compandi contra di	per condition for transport accions to the terms of the attaches of CFR 262-27(a) (F) am a large	ording to applica d EPAAchonele in quantity pone Sign Export from to	othe international and not adopted of Consent adopt or (b) (61 am a sma store (5.5. Port of ent Oate baselin dure	oral governo al quantity gar ylasit	ertal regulations	reging name i. If export sh	and are class great and I a More	offet, peckaged in the Primary
	15. GENERATOR'S OFFERO marked and labeled places (Experts, I certify that the I I certify that The I certify that the Cemeration Victorium 1 Primatelly (5. International Dispersional States (15. International States (I certificational States) (17. Transporter Administrational States) "Samporter I Primatell' Speed National Transporter I Primatel Speed National Transporter I Primatel Speed National States (15. Transporter I Primatel Speed National States)	PS CERTIFICATION: I heaving the control of an an an and an expention principle of the consequent confirmation of the consequent confirmation and the control of the control	per condition for transport accions to the terms of the attaches of CFR 262-27(a) (F) am a large	ording to applica d EPAAchonele in quantity pone Sign Export from to	other international and rela- giographic of Consent, relative to (E) (E) an a since study to (E) (E) and a since study (E)	oral government grantity gar disparently gar yield: g U.S.:	ertal regulations	, Fegat sh	Mari and La	in the Poney  in the Poney  in Coy  in Coy  in Coy  in Coy  in Coy
	15. GENERA NOP SOFTERED  marked and identification  floorins. Certify that the  Landify both was  Generally O'Cherch Political  Section of	PE-CESTRICATION: I heady to dispersion of the dark and a dispersion in promise of the cestion of the dark and a dispersion of the dark and the dark	ger confiles for transport acception to the standor of the attached to COFR 260, 27(pc) (F) am a large	ording to applica d EPAAchonele in quantity pone Sign Export from to	othe international and elaphoret of Consent, captured of Consent, related or (b) (F) am a smallbulle (B). Put of entre Caste leaves divise	oral government grantity gar disparently gar yield: g U.S.:	ertal regulations	jedon	Mari and La	B Day B Day B Day
	15. GENERA NOP SOFTERN reland and interlegional relands and interlegional regional county of the Lander Harthy was to the Lander Harthy was to the Lander Harthy was to the Lander Harthy was to the Lander Harthy was to The	NE CESTRICATION: I haven't till det at at at at disspective per mente of the companies of t	ger confiles for transport acception to the standor of the attached to COFR 260, 27(pc) (F) am a large	ording to applica d EPAAchonele in quantity pone Sign Export from to	other international and rela- giographic of Consent, relative to (E) (E) an a since study to (E) (E) and a since study (E)	oral government grantity gar disparently gar yield: g U.S.:	erbi repilitore	jedon	Mari and La	B Coy B Coy B Coy B Coy B Coy B Coy
	15. GENERA NOP SOFTERN returns and set interesting returns and set interesting the part for Experts. I can't be proportion. The part of Generation SOftman's Protecting Set Interesting Softman Softman Softman Therepore Protecting Softman S	PECENTECATOR: I heading the Control of the Control	ger confident for transport on the transport of the abboth on the term of the abboth of the	ording to applicate of PPA. Active o	other international and relative production of the control of the	oral government grantity gar disparently gar yield: g U.S.:	erbi repilitore	jedon	More and a	B Coy B Coy B Coy B Coy B Coy B Coy
	15. GENERA NOP SOFTERN returns and set interesting returns and set interesting the part for Experts. I can't be proportion. The part of Generation SOftman's Protecting Set Interesting Softman Softman Softman Therepore Protecting Softman S	NE CESTRICATION: I haven't till det at at at at disspective per mente of the companies of t	ger confident for transport on the transport of the abboth on the term of the abboth of the	ording to applicate of PPA. Active o	other international and relative production of the control of the	oral government grantity gar disparently gar yield: g U.S.:	erbi repilitore	jedon	More and a	B Coy B Coy B Coy B Coy B Coy B Coy
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### **Top Third of Manifest**

> Generator, Transporter, Designated Facility Information

1	UNIFORM HAZARDOUS WASTE MANIFEST  1. Generator ID Number	2. Page 1 of	Emergency Response Phone	4. Manifest Tracking Number
	5. Generator's Name and Mailing Address		Generator's Site Address (if different than	mailing address)
	Generator's Phone:			
	6. Transporter 1 Company Name			U.S. EPA ID Number
	7. Transporter 2 Company Name			U.S. EPA ID Number
	Designated Facility Name and Site Address			U.S. EPA ID Number
	Facility's Phone:			

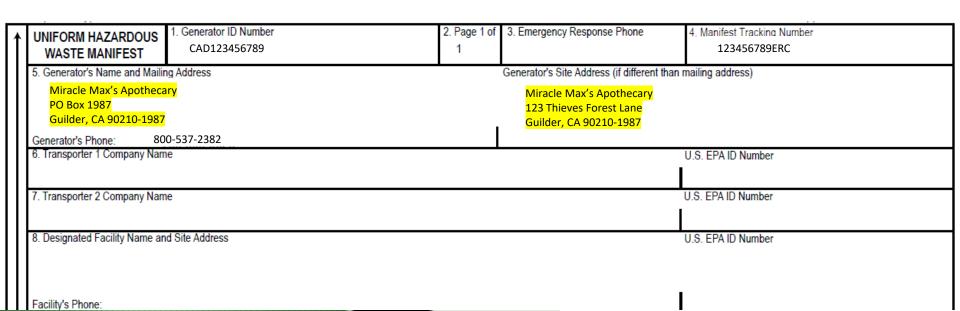
## Blocks 1, 2, 4, 5

- > ID number, Name, Address, Phone Number
- Manifest Tracking Number
- > Page 1 of ...

↑ UNIFORM HAZARDOUS WASTE MANIFEST  1. Generator ID Number CAD123456789	2. Page 1 of 3. Emergency Response Phone 4. Manifest Tracking Number 1 123456789ERC	
5. Generator's Name and Mailing Address	Generator's Site Address (if different than mailing address)	
Miracle Max's Apothecary		
123 Thieves Forest Lane		
Guilder, CA 90210-1987		
Generator's Phone: 800-537-2382		
6. Transporter 1 Company Name	U.S. EPA ID Number	
7. Transporter 2 Company Name	U.S. EPA ID Number	
Designated Facility Name and Site Address	U.S. EPA ID Number	
o. Designated 1 dollity Hume and Oile Address	U.O. LI A ID Nullibel	
Escilit de Phone:		

#### Block 5

> If Mailing address not Site Address, add Site Address



#### Block 3

- > 24-hour Emergency Response Telephone Number
  - DOT requirement
  - Include contract number if outside provider

1	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number CAD123456789	2. Page 1 of 1	3. Emergency Response Phone 1-800-537-2382	Manifest Tracking Number     123456789ERC
ı	5. Generator's Name and Mailin	g Address		Generator's Site Address (if different the	nan mailing address)
	Miracle Max's Apotheca 123 Thieves Forest Lane Guilder, CA 90210-1987	•		Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987	
L	Generator's Phone: 80	0-537-2382			
ı	6. Transporter 1 Company Nam	e			U.S. EPA ID Number
l					
ı	7. Transporter 2 Company Nam	e			U.S. EPA ID Number
l					
ı	8. Designated Facility Name an	d Site Address			U.S. EPA ID Number
ı					
1					
1					•

### 24-hour Emergency Response Number

#### > 49 CFR 172.604

• The name of the person, or contract number or other unique identifier assigned by an ERI provider, identified with the emergency response telephone number must be entered on the shipping paper immediately before, after, above, or below the emergency response telephone number unless the name is entered elsewhere on the shipping paper





### **Block 6 Transporter 1**

> Company Name and ID number

<u></u>	UNIFORM HAZARDOUS WASTE MANIFEST  1. Generator ID Number CAD123456789	2. Page 1 of 1	3. Emergency Response Phone 1-800-867-5309 Contract #: 123	4. Manifest Tracking Number 123456789ERC
	5. Generator's Name and Mailing Address		Generator's Site Address (if different than	mailing address)
	Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987		Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987	
	Generator's Phone: 800-537-2382			
	6. Transporter 1 Company Name			U.S. EPA ID Number
l	Humperdink's Hauling Company			CAT123456789
ı	7. Transporter 2 Company Name			U.S. EPA ID Number
ı	Designated Facility Name and Site Address			U.S. EPA ID Number
	Facilité de Dhanas		1	

### **Block 7 Transporter 2**

- > Different Company, *not* Different Driver
- Company Name and ID number

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number CAD123456789	2. Page 1 of 1	3. Emergency Response Phone 1-800-867-5309 Contract #: 123	4. Manifest Tracking Number 123456789ERC
<ol><li>Generator's Name and Maili</li></ol>	ng Address		Generator's Site Address (if different than	mailing address)
Miracle Max's Apotheca 123 Thieves Forest Land Guilder, CA 90210-1987			Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987	
Contrator of Hone.	00-537-2382			
Transporter 1 Company Nan	ne			U.S. EPA ID Number
Humperdink's Hauli	ng Company			CAT123456789
7. Transporter 2 Company Nan	ne			U.S. EPA ID Number
Fezzik's Freight				CAT023456789
8. Designated Facility Name ar	nd Site Address			U.S. EPA ID Number

### **Block 8 Designated Facility**

- Name, Site Address
- > Phone Number
- > EPA ID Number

UNIFORM HAZARDOUS WASTE MANIFEST  1. Generator ID Number CAD123456789	2. Page 1 of 1       3. Emergency Response Phone 1-800-867-5309 Contract #: 123       4. Manifest Tracking Number 123456789ERC
5. Generator's Name and Mailing Address	Generator's Site Address (if different than mailing address)
Miracle Max's Apothecary 123 Thieves Forest Lane Guilder, CA 90210-1987	Miracle Max's Apothecary  123 Thieves Forest Lane  Guilder, CA 90210-1987
Generator's Phone: 800-537-2382	
6. Transporter 1 Company Name	U.S. EPA ID Number
Humperdinck's Hauling Company	CAT123456789
7. Transporter 2 Company Name	U.S. EPA ID Number
Fezzik's Freight	CAT023456789
Designated Facility Name and Site Address     Inigo's Incinerator	U.S. EPA ID Number
456 Castle Lane Floren, UT 84029	UTD023456789
800-283-2735	l l

#### Middle Third of Manifest

- Mostly DOT
- Waste Codes

9a.	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number,	10. Conta	iners	11. Total	12.Unit Wt./Vol	13.	Waste Co	des
НМ	and Packing Group (if any))	Number	Type	Quantity	VVI./ VOI			
	1.							
	2.							
	3.							
	4.						·	·





### 9a, X or RQ

#### > X if a DOT regulated hazardous material

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Conta	iners Type	11. Total Quantity	12.Unit Wt./Vol	13.	Waste Co	odes
X	1. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s. (iocane, alcohols), 6.1, II	4	DM	100	Р	D001	212	
	2.							
	3.							
	4.							





### 9a, X or RQ

#### > RQ if a single package exceeds reportable quantity

9a.	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number,	10. Conta	iners	11. Total	12.Unit Wt./Vol	13.	Waste Co	des
НМ	and Packing Group (if any))	Number	Type	Quantity	VVI./ VOI			
X	1. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s.	4	DM	100	Р	D001	212	
^	(iocane, alcohols), 6.1, II	-		100	•			
DO.	2. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s.	1	D. 4	400	_	D001	212	
RQ	(iocane, alcohols), 6.1, II (D001)	1	DM	400	Р			
	3.							
	4.							





### 9a, X or RQ

- > RQ if a single package exceeds reportable quantity
  - Either before or after US DOT description

9a.	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number,	10. Conta	iners	11. Total	12.Unit Wt./Vol	13.	Waste Co	des
НМ	and Packing Group (if any))	Number	Type	Quantity	***:, ***			
	1. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s.	4			P	D001	212	
Х	(iocane, alcohols), 6.1, II	4	DM	100	P			
	2. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s.	_		4.600		D001	212	
RQ	(iocane, alcohols), 6.1, II (D001)	4	DM	1600	Р			
Х	3. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s.	1	DM	1600	P	D001	212	
^	(iocane, alcohols), 6.1, II, <mark>RQ</mark> (D001)	4	ועוט	1000	<b>r</b>			
	4.							





### **RQ** mistakes

- > Incorrect, or omitted, RQs is very common
  - D002 reportable quantity is 100 lbs
  - D007 RQ is 10 lbs

9a.	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total	12. Unit	t 42.14		
НМ		No.	Type	Quantity	Wt./Vol.	13. Waste Codes		
x	1. UN2796, WASTE SULFURIC ACID, 8, PG II	ppi	TP	29510	P	D002	D007	
x	2 NA3082, HAZARDOUS WASTE, LIQUID, N.O.S., (D007), 9, PG III	p\$3	TP	7134	D	D007		





### **RQ** mistakes

- Before <u>or</u> after basic description
  - NOT in between elements of basic description
  - AND...
    - RQ for D001 is 100 lbs
    - RQ for D035 is 5000 lbs
    - This is only a 30 lb container, so RQ not required AND in wrong location

X	(Paint, Methyl Ethyl Ketone)	01	DM	30	P	D001	D035	
	3, II, (RQ=100lbs), ERG# 128							





### **RQ** mistakes

- > Before <u>or</u> after basic description
  - RQ for D001 is 100 lbs
  - 3000 gallon container probably exceeds this

9a.	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,		10. Containers		12. Unit	12 Wests Codes		
HM	and Packing Group (if any))	No.	Type	Quantity	Wt./Vol.	13.	Waste Codes	
x	1. UN1863, WASTE FUEL, AVIATION, TURBINE ENGINE, 3, PG III	01	77	3000	9	D001	343	





### 49 CFR 172.203 (c)

If the material contains two or more hazardous substances, at least two hazardous substances, including the two with the lowest reportable quantities (RQs), must be identified. For a hazardous waste, the waste code (e.g., D001), if appropriate, may be used to identify the hazardous substance.

	X	RQ, UN2810, RQ, WASTE TOXIC LIQUID, ORGANIC, N.O.S., 6.1, PGIII, (MONOETHANOLAMINE)	4	TP	1206	6	D007-	D010	-	
- (		4.		$\overline{}$		_	,	7.7		

- Which are the two lowest RQs?
  - MEA RQ = 100 lbs
  - D007 RQ = 10 lbs
  - D010 RQ = 10 lbs





### 49 CFR 172.203(k) - Generic PSNs

> If a material is described on a shipping paper by one of the proper shipping names identified by the letter "G" in column (1) of the §172.101 Table, the technical name of the hazardous material must be entered in parentheses in association with the basic description.

	X	RQ, UN2810, RQ, WASTE TOXIC LIQUID, ORGANIC, N.O.S., 6.1, PGIII, (MONOETHANOLAMINE)	4	TΡ	1206	6	D007	D010	-	
г		4	_,_			-	,	7.7		1

- > MEA is added correctly, but not the RQs
  - Including waste codes at far right does not count





#### 49 CFR 172.202(b) - Sequence of Information

> ID Number, Proper Shipping Name, Hazard Class (subsidiary hazard, if any, in parenthesis), and Packing Group, if any

L							
	9a.	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,	10. Contain	ers	11. Total	12. Unit	13. Waste Codes
	НМ	and Packing Group (if any))	No.	Type	Quantity	Wt./Vol.	15. Waste Codes
	X	1 RG, Waste Corresive Liquid, Basic, Inorquine, N.O.S. (Copper Tetramine Dichloride), 8, UN3266, PEH (DOO4)	CO 21	)F	11597	- Andrews	DEDZ COOH DOW
-11		2					1

Wrong sequence





#### 49 CFR 172.202(b) - Sequence of Information

ID Number, Proper Shipping Name, Hazard Class (subsidiary hazard, if any, in parenthesis), and Packing Group, if any

93.	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10 Containers			NCD 121 700 777				
нм	and Packing Group (if any))	Thirt, Thatara Gass, its Notices,	10. Conta	iners	11. Total	12. Unit		
$\neg$	i. UN3469, Waste Paint, Flamm	and C	No.	Type	Quantity	WL/Vol.	13. Waste Codes	
X	to the state of th	rable, Corrosive					D001 D002	
	3, PG II ERG #132	1989-6	001	DF	00100	P		
ľ			1			-		

Missing subsidiary hazard (8) in parenthesis following primary hazard (3)





#### What about Non-RCRA Haz Wastes?

If it meets DOT definition of hazardous material, still follow all DOT rules (don't add "waste" to PSN)

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers  Number Type						11. Total Quantity	12.Unit Wt./Vol	13.	Waste Co	des
RQ	1. UN 2315, Polychlorinated biphenyls, liquid, 9, II	1	DM	100	Р	261						
	2.											
	3.											
	4.											





#### **PCBs**

- > DOT only regulates ≥ RQ (1 lb); for ground, change PG II to III
- > TSCA wants kgs, not lbs (40 CFR 761)

	7 10 07 ( Walles 185) 110 t 185 ( 10 01 17 7 0 17									
9a.	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number,		10. Containers		12.Unit Wt./Vol	13. Waste Codes				
НМ	and Packing Group (if any))	Number	Type	Quantity	111., 10.					
DO	<sup>1.</sup> UN 2315, Polychlorinated biphenyls, liquid, 9, III	1		10	l.a	261				
RQ	on 2515, Polychlormated Diphenyis, liquid, 9, <mark>iii</mark>		DM		<mark>kg</mark>					
	2.									
	3.									
	4.									
	•									
ll l										





### **Asbestos**

#### > DOT only regulates ≥ RQ (1 lb)

9a. HM	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers  Number Type		11. Total Quantity	12.Unit Wt./Vol	13.	Waste Co	des														
RQ	1. NA 2212, Asbestos, 9, III		1						1	1	1	1	1	1	1 DI	1 DM 10	1 DM	100	Р	151		
'\\	147 ( 22 12, 7 (3) 63 (63, 5) 111	_		100	'																	
	2.																					
	3.																					
	4.																					





#### What about Non-RCRA Haz Wastes?

> If it does NOT meet a DOT hazmat definition, use generic description or, when possible, Appendix X name

9a.	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number,	10. Containers		11. Total	12.Unit Wt./Vol	13. Waste Codes															
НМ	and Packing Group (if any))	Number	Type	Quantity	171., 701																
	1. Tanning sludge, non-RCRA hazardous waste, solid	1	1	1	1	1	1	1	1	1	1	1	1	1	1	DM	DM 100	P	491		
	ranning staage, non henvinazaraous waste, sona	_			•																
	2.																				
	3.																				
	4.																				





### All Together Now...

> RQ if a single package exceeds reportable quantity

9a.	9b. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number,	10. Containers		11. Total	12.Unit Wt./Vol	13. Waste Codes		
НМ	and Packing Group (if any))		Type	Quantity	VVI./ VOI			
Х	1. UN 2929, Waste Toxic liquids, flammable, organic, n.o.s.		DM	1600	Р	D001	212	
^	(iocane, alcohols), 6.1, II RQ (D001)		1000					
RQ	2. UN 2345, Polychlorinated biphenyls, 9, III	1	DM	10	KG	261		
		4						
	3. Tanning sludge, non-RCRA hazardous waste, solid	1	DM	M 100	KG	491		
				100				
	4.							





### Before you sign...

#### Read the fine print

I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations....

15.	GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and a	re classifie	d, packag	ged,
	marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment	and I am th	e Primar	4
	Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.			
	I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.			
Gen	erator's/Offeror's Printed/Typed Name Signature	Month	Day	Year
		1 !		l









# **Any Questions?**

Andy Smith <u>asmith@ercweb.com</u>

