

Transporters



**ENVIRONMENTAL
QUALITY**

WASTE MANAGEMENT & RADIATION CONTROL

The Basics

Any person engaged in the offsite transportation of hazardous waste by air, rail, highway, or water.

R315-263

No transporting until you have an EPA ID number – use EPA Form 8700-12

Follow DOT Regulations – 49 CFR 171-179



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Requirements

Manifest!

- * Generator must sign and date
- * Transporter must sign and date
- * Each subsequent transporter must sign and date
- * Designated facility must sign and date

Do not sign manifests that do not include all required signatures

Do not transport waste on manifests that do not include all required signatures



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Requirements

Manifest copies

- * Generator keeps initial copy signed by themselves and transporter 1
- * Each transporter keeps transporter copy signed by previous holder of waste, themselves, and the subsequent holder of waste
 - * Keep for 3 years
- * Designated facility sends final signed copy back to generator, generator keeps for 3 years

Electronic manifests OK, but must be able to show upon request from inspector



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Requirements

Manifest stays with waste at all times!



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Requirements

Clean up spills – transporters required to take immediate action in the event of any spills while waste in their possession

Subject to same spill reporting requirements as generators



Actions OBO the Generator

Signing the manifest

- * Generator and contractor must have established means to ensure the contractor is properly authorized to sign on behalf of the generator
- * Responsibility remains with the generator to ensure information is correct



Actions OBO the Generator

Changing the manifest once signed by the generator

- * Must be authorized by contract to act as the generator's agent
- * Can only:
 - * Change the transporters designated on the manifest
 - * Add a new transporter
- * Must enter "Contract retained by generator confers agency authority on initial transporter to add or substitute additional transporters on generator's behalf;" in Item 14 of each manifest for which change is made



Actions OBO the Generator

Changing the manifest once signed by the generator

- * If no contractual authority, transporter must contact the generator and receive authorization for revisions



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Rejected wastes

- * Original manifest signed and dated by designated facility – new manifest number and description of rejection noted on manifest
- * Transporter maintains copy of original manifest, and new manifest if they are the ones to transport
 - * Retain copies of all manifests together



Repacking wastes

If mixing two different DOT shipping descriptions:

- ❑ Remanifest waste with transporter as generator
- ❑ Indicate original generators in box 14 of manifest
- ❑ Original manifests attached to and conveyed with the new manifest and waste
 - ❑ Original manifests DO NOT leave the waste!

If mixing waste with same DOT shipping descriptions, new manifest not needed but original manifest must be marked to reflect changes



Splitting shipments

Shipment arrives on single manifest but must be divided by the transporter (i.e. into separate trucks)

Transporter must:

- * Obtain consent from generator
- * Amend original manifest to reflect waste on first shipment, complete a second manifest with the remaining waste for the second shipment
- * Note the manifest numbers in the discrepancy box (Item 18) on manifest so they can be retained together



Container requirements

Must be labeled:

- * Hazardous waste
- * Generator's name and address
- * Generator's EPA ID number
- * Manifest tracking number
- * EPA HW codes

In good condition



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Transfer Facilities

Any transportation related facility where HW or HSMs held during the normal course of transportation

Loading docks, parking areas, storage areas, etc.

Waste may be stored at a transfer facility for ten days or less without needing a storage permit

No tank storage – containers only!



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Normal Course of Transportation

(per EPA guidance)

RCRA Online (RO) documents #[11520](#) and #[11846](#)

Up to State or EPA region authority to determine whether circumstances are in keeping with a normal course of transportation or not.



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Normal Course of Transportation

(per EPA guidance)

Inconsistent with the normal course:

1. Possession of the waste changes from one transporter to another while the waste remains at the site
2. Waste is routed to the same geographic location more than once during the course of transportation
3. Waste is routed to numerous transporters for extended periods of time



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Generator Responsibilities

Check those manifests for accuracy before signing (or allowing anyone else to sign)

Make sure you get your return copies. File exception reports as needed.



Questions?

Email questions to gmarinick@utah.gov



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