



Step 6: Transport and Dispose of Hazardous Waste Correctly

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Information on transporter regulations in this fact sheet is provided in cooperation with the Minnesota Department of Transportation. This is Step 6 in the “10 Steps to Compliance” series.

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Environmental Concerns

A generator of hazardous waste is responsible for the waste from the “cradle” — the time the waste is first generated — to the “grave” — the time the waste reaches final disposal — and sometimes beyond. To lessen your liability, first use all methods possible to decrease the amount of hazardous waste you generate. Then, to lessen the chance that the waste will be mismanaged when it leaves your hands, choose a transporter who will handle and dispose of your waste according to Minnesota and federal regulations.

Before Contacting a Hazardous Waste Transporter

Before contacting a prospective hazardous waste transporter, you should know:

- the kind(s) and amount(s) of waste to be picked up;
- whether the waste is a liquid, solid or sludge;
- the type(s) of containers(s) holding the waste;
- how often you will need to ship waste; and
- the location of the facility you have chosen to recycle, treat, or dispose of your waste.

Others to Contact

- Ask prospective transporters for references and call them. Find out if present customers are satisfied.
- Call the Minnesota Department of Transportation (Mn/DOT) for current license verification (see page 6).

Hazardous Waste Transporter Requirements

In order to obtain a license or permit from Mn/DOT, a hazardous waste transporter must meet the requirements listed below. You may wish to verify that the prospective transporter has met all of these requirements.

Transporters must:

- have a U.S. Environmental Protection Agency (EPA) Identification Number;
- be registered with and permitted as a hazardous waste transporter in the Uniform Hazardous Materials Registration Program. A transporter participating in this reciprocal, base-state registration/permitting program must be registered with and permitted by MnDOT, or by Nevada, Ohio, Illinois, Michigan or West Virginia and carry a copy of the Uniform Hazardous Materials registration permit in each vehicle;
- be registered with the USDOT as a hazardous materials transporter, if transporting a type or quantity of hazardous materials or hazardous waste that requires the vehicle to be placarded, and carry a copy of the USDOT registration in each vehicle;
- be registered to haul hazardous waste in the destination state and the states through which it must travel;
- have \$5 million liability insurance if transporting hazardous wastes classified as division 1.1, 1.2, 1.3 explosives, or division 2.3 or 6.1 poisons in Inhalation Hazard Zone A;



- have \$5 million liability insurance if transporting hazardous substances in cargo tanks with a total capacity greater than 3,500 gallons;
- have \$1 million liability insurance if using a tank truck with a bulk capacity of less than 3,500 gallons (if not required to have \$5 million liability insurance);
- have \$1 million liability insurance if hauling drums or other nonbulk packages of hazardous waste (if not required to have \$5 million liability insurance);
- have a current MCS-90 liability insurance endorsement* in the correct amounts for the class and mode of transport provided;
- have drivers qualified according to Federal Motor Carrier Safety Regulations (FMCSR)**; and
- if a for-hire carrier, have the appropriate inter-/intra-state motor carrier authority.

*An MCS-90 endorsement is an endorsement to a regular insurance policy stating that the policy will cover environmental restoration in the case of an incident or accident involving hazardous materials. It is wise to get a copy of a completed MCS-90 endorsement from your transporter prior to shipping.

**FMCSR requirements include road testing, a written examination, physical qualification, drug and alcohol testing, and certification showing the driver has passed a physical examination.

Drivers must be trained and tested in the following areas:

- emergency response procedures, including a written contingency plan;
- use of DOT hazard communication standards, including shipping papers, marking of packages, hazard class labels and placarding of vehicles;
- selection of authorized UN standard packaging;
- proper marking and labeling of hazardous waste containers;
- safe loading and handling procedures including inspecting containers, segregating incompatible materials and securing the load;
- vehicle operation requirements; and
- filling out hazardous waste manifests.

Drivers should visually inspect the truck prior to each trip, and carry proper emergency equipment, including reflective triangles, fire extinguishers and spill kits.

Suggested Questions to Ask a Transporter

Before making your final selection, you may also wish to ask some of these questions of your prospective transporter:

- Will the transporter haul to your chosen facility?
- Will the transporter haul (only) as often as you need?
- How long has the transporter been in business?
- Who are some customers in your area with similar wastes?
- What is the cost of transportation? Is that included in the facility's recycle or disposal charges?
- Will the transporter provide manifests and proper DOT labeling?
- Will the transporter haul hazardous waste from other companies in the same truck or tank with your waste?

A thorough background check before contracting with a transporter may prevent potential problems.

Hazardous Waste Disposal Options

In general, the more expensive a disposal method, the more it reduces your long-term liability. Talk to your potential disposal facility about the disposal options for your waste. Then, choose the waste disposal method that is best for you and the waste involved.

With the exception of oil in specific circumstances, hazardous waste may not be burned on site. Neither can it be evaporated nor dumped on the ground. Some corrosive wastes may be neutralized and sewered. Some wastes, such as silver-containing photo fixer, may be sewered following removal of the silver. (For more information about sewerage, please call your local wastewater treatment plant operator, your metropolitan county hazardous waste staff or the MPCA.) Most hazardous wastes are managed by sending them to an off-site recycling or disposal facility.

Before Selecting a Facility

If possible, visit the facility before shipping wastes there. You can then assess for yourself how your wastes will be managed. If you cannot visit a facility, you can:

1. Talk to your association representative or others in your industry. Have other members used a particular facility? Are they satisfied?
2. Talk to other people in your area with similar wastes. What are their experiences with a particular facility?



3. Talk to your broker, transporter or facility representative. Ask:

- Is the company the final disposal facility or are they a broker? (A broker may only arrange for waste handling or transportation to a facility.) If the company is acting as a broker, what is the name and location of the actual disposal facility?
- What method of disposal will the facility use to treat or dispose of your waste?
- Who are some customers in your area with similar wastes? (Call them. Are they satisfied?)
- How will the waste be transported to the facility? (Some companies use their own vehicles; others use a contract carrier. In either case, you will want to make sure the waste is hauled by a licensed hazardous waste transporter.)
- Does the facility have a minimum pickup charge?
- Is a waste sample required? If so, what is the fee for analysis? Will the facility help fill out sample submittal paperwork? Will the facility assist in packaging and delivery of the sample? If the waste has already been analyzed by an outside laboratory, will the facility accept that analysis? If competitive bids for analytical work are acceptable, what tests and units of measurement are necessary?
- How long will it take to arrange for shipping? How long is the approval process? Does the disposal facility help with approval/transportation paperwork?
- Can the disposal costs be itemized (handling, treatment, disposal, applicable surcharges, taxes)?

In addition, you may request information showing that the facility is permitted to receive the kind of hazardous waste you generate and has an EPA identification number. You may request copies of the portion(s) of its permits that cover the kind of treatment, disposal or recycling it will perform on your waste.

4. Call the state regulatory agency where the facility is located. Talk to the person who inspects the facility (see

Table 1 for selected regulatory agencies and telephone numbers). Ask the inspector these questions:

- Is the facility currently in compliance with all regulations? If not, where or what are its deficiencies? Are those deficiencies minor (such as paperwork) or major (such as improper management)? How are major problems, if they exist, being addressed?
- Is the facility permitted to take the kind of waste my company generates?
- Has the facility received any fines in the past?
- How often is the facility inspected by your staff?
- Is the facility on the Superfund Cleanup list or a state cleanup list?

It is important to maintain contact with state officials, especially if you cannot visit the facility. It is reasonable to contact officials as often as they inspect the facility.

Table 1: States Often Accepting Hazardous Waste from Minnesota

Alabama	Dept. of Environmental Management	(334) 271-7700
Illinois	Illinois EPA Bureau of Land	(217) 782-6760
Indiana	Dept of Environmental Management	(317) 232-7956
Louisiana	Dept. of Environmental Quality	(225) 765-0741
Michigan	Dept. of Environmental Quality	(517) 373-2730
Minnesota	Pollution Control Agency	(651) 297-7560
Ohio	Ohio EPA Bureau of Land/HW	(614) 644-2917
Oklahoma	Dept. of Environmental Quality	(405) 702-5100
Texas	Natural Resources Conservation Commission	(512) 239-6082
Wisconsin.....	Dept. of Natural Resources	(715) 839-3734

5. Before arranging shipment of your hazardous waste you should request:

- a copy of the approval letter for the facility's financial assurance and liability coverage (reviewed annually by the state);
- a contract with the facility for their services (recheck the authorization, waste codes, quantities, types of containers and date of expected waste shipment), and a certificate of disposal, if available.

Making a Facility Visit

1. Talk to facility officials. You may wish to ask some or all of these questions:

- What is your facility's safety record? Has your contingency plan ever been implemented?



- Do you sample wastes to verify content prior to treatment, recycling or disposal?
- Do you have lab facilities on site? What kind(s) of analyses do you do?
- Can I tour the lab?
- How are wastewater effluents monitored?
- What happens to ash or sludge from processing or incineration?
- How do you handle off-specification wastes?
- How long has the firm been in business?
- Who does inspections? What do they look for?
- If the facility is a hazardous waste landfill, how often is ground water data collected? How many sampling points do you have?

2. Tour the facility.

Look at: general housekeeping; spill-containment capabilities; workers using safety equipment; security provisions such as fences, warning signs, etc.; condition of buildings, tanks and equipment; backlog of wastes in the plant; disposition of empty drums; manifest files, and other document tracking mechanisms.

One Minnesota generator who visits every facility before shipping waste says: "I look particularly at the backlog of waste and their general housekeeping. If they have a lot of waste on hand or if their housekeeping is sloppy, I don't send waste there."

In addition, a hazardous waste facility which is permitted by federal, state and/or local governments should have satisfactory

safety equipment, in-house training manuals for employees, containment for possible leaks or spills, inspection procedures and records, closure and postclosure plans, personnel records and job descriptions, and emergency contingency plans.

Remember, under current interpretation, hazardous waste generators continue to be responsible for the waste they have generated even after making good off-site waste management choices. Know where your waste is going, how it is managed, and what happens to residues, ash, and empty drums. It is not only your responsibility, it is the law which protects Minnesota's quality of life.

For More Information

Your metropolitan county, the Minnesota Department of Transportation (MnDOT) and the MPCA have staff available to answer questions. For hazardous waste information, contact your metropolitan county hazardous waste office or the MPCA office closest to your county. For transporter information, contact MnDOT.

Metro County Hazardous Waste Offices

Anoka County	(612) 422-7093
Carver County	(952) 361-1800
Dakota County	(952) 891-7020
Hennepin County	(612) 348-8100
Ramsey County	(651) 773-4466
Scott County	(952) 496-8177
Washington County	(651) 430-6655

Minnesota Pollution Control Agency

Toll free	(800) 657-3864
Brainerd	(218) 828-2492
Detroit Lakes	(218) 847-1519
Duluth	(218) 723-4660
Marshall	(507) 537-7146
Rochester	(507) 285-7343
St. Paul	(651) 297-2274
Willmar	(320) 214-3786
Web Site	http://www.pca.state.mn.us

Minnesota Department of Transportation

Toll free	(888) 4-SAFETY
Hazmat Section	(651) 405-6060
Web Site	http://www.dot.state.mn.us/trim/mcs