



Environmental Fact Sheet

Department of Environmental Conservation
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<http://www.anr.state.vt.us/dec/dec.htm>

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US Department of Transportation (DOT) Regulation Affects Hazardous Waste Generators

As the result of a recent Federal rule revision, more 'offerors' or shippers of hazardous materials are now required to register with the U.S. Department of Transportation (US DOT).

When does this requirement go into effect and who must register?

As of July 1, 2000, any "person [who]... offers or transports in commerce a quantity of hazardous material that requires placarding" is required to register with the US DOT. If you are a farmer, you are exempt from the rule.

Definition:

Hazardous Materials - the broadest term used by the DOT to cover all materials listed in the Hazardous Materials table (this includes hazardous waste and new product). Thus, all hazardous wastes are automatically within the larger group defined as "hazardous materials".

What quantity of hazardous material requires placarding?

According to the US DOT, hazardous material that is offered or transported in non-bulk packaging must be placarded if:

1. The shipment contains *any* amount of the following hazard categories: explosives, poison gas, dangerous when wet, organic peroxide, poison inhalation hazard, or radioactive; **or**
2. The total gross weight of the hazardous material contained in the shipment is 1,001 pounds or more and it does *not* contain any of the hazard categories mentioned above.

How much does it cost to register with US DOT?

US DOT has a two-tiered fee system. If you meet the Small Business Administration's definition of a small business (have less than 500 employees and meet other assorted conditions), the fee is \$300 per year. If you do not meet this small business definition, the fee is \$2,000 per year. (There are discounts for multi-year registrations.)

Is there anything I can do to keep this registration requirement from applying to me?

Keep the gross weight of all Federal DOT listed hazardous materials in each of your shipments to less than 1,001 pounds. Note that Vermont listed hazardous wastes do *not* count toward this gross weight limit unless they are also a federal hazardous waste (due to their DOT classification as noted above or due to the quantity of the CERCLA hazardous substance involved).

For example: VT02 (waste oil) and VT03 (metal cutting and grinding fluids) clearly do not count since they are only listed as a "VT" hazardous wastes. Although, VT06 (pesticidal waste and obsolete pesticidal products) is not a federal hazardous waste, it may have a hazardous substance in it in excess of its regulated quantity, which would make the shipment a hazardous material.

Who can I call to get forms or more information?

If you have a question regarding this Federal registration requirement, you can call the Registration Program office at (202) 366-4109 or e-mail REGISTER@rspa.dot.gov. A registration form can be obtained from the same phone number, or from the US DOT website at <http://hazmat.dot.gov/register.htm>.