
RRI'S ADVANCED DOT WASTE PACKAGING & TRANSPORT WORKSHOP

Syllabus — Course 302

Target: The target for this workshop includes individuals who must designate and classify an “unpackaged” waste ensuring it is in full compliance with all applicable waste designation and DOT requirements. Specific disciplines include but are not limited to: RCRA waste operations; waste characterization; laboratory technicians; field operations; environmental samplers; packaging operations; managers and supervisors; inspectors; auditors; engineers...anyone in the waste operations and management arena.

Length: 5 days

Prerequisite: RRI's DOT Hazardous Materials & Waste Transport Workshops (Courses 201 & 202) or equivalent course. Active time in operations is recommended.

Intensity: __ Mild __ Medium X Challenging __ Extreme

Materials: RRI provides all training materials including the latest 49 CFR 100-180 and excerpts from 40 CFR 260-280. Testing and course completion certificate are also provided.

Objectives & Topics:

Module 1: Laws and Regulations

Recognize the regulations that affect the packaging and transport of hazardous wastes.

1. Identify the transport and packaging interface for PCBs in the TSCA regulations.
2. Identify the transport and packaging interface for Asbestos in the NESHAP regulations.
3. Identify the hazard communication interface for DOT regulated materials in the OSHA regulations.
4. Identify the transport and packaging interface for RCRA hazardous waste in the RCRA regulations.
5. Identify the interface for designating hazardous substances from the CERCLA regulations.
6. State the scope of the DOT Hazardous Materials Regulations (HMR) for packaging and transport of wastes.

Module 2: Waste Designation

Designate wastes per RCRA and TSCA defining criteria.

1. State acceptable knowledge requirements for waste characterization.
2. Define RCRA solid waste.
3. Apply common exceptions to the definition of RCRA solid waste.
4. Define RCRA hazardous waste.
5. Assign a waste code(s) to a given waste.
6. Recognize the common exception to RCRA hazardous waste.
7. Recognize the importance in determining the point of generation.
8. Identify additional waste management paths or additional requirements for a given waste (e.g., precious metals, universal wastes, and others).

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Module 3: Hazardous Substances

Determine if a given waste is also a reportable quantity of a hazardous substance.

1. State the exception for certain metals.
2. Apply the CERCLA Mixture Rule.
3. Define, per DOT HMR, a hazardous substance.
4. Differentiate between an unlisted and listed hazardous substance.
5. Designate the reportable quantity for a given waste.

Module 4: HMR Classification

Classify a waste per the DOT HMR defining criteria.

1. Recognize when a waste becomes subject to the HMR.
2. Identify the shipper's responsibilities concerning waste classification and packaging.
3. Determine, for a given waste, the primary and subsidiary(s) hazard class/division.
4. Select the most appropriate proper shipping name for a given waste.
5. Recognize the importance of the Special Provisions.
6. Perform DOT classifications on excepted RCRA wastes (e.g., precious metals, universal wastes).

Module 5: Packaging

Select the optimal package for transport of a given waste.

1. Distinguish the two main divisions of non-bulk packaging.
2. State the minimum requirements for all non-bulk packages containing, or intended to contain, a DOT regulated hazardous material.
3. State the requirements of an excepted package for a given waste.
4. Decipher the information presented in a U.N. specification package marking.
5. Determine the maximum vapor pressure of material authorized in a given U.N. specification packaging.
6. Calculate the authorized fill limit for a given U.N. specification packaging.
7. Apply the requirements for a given exception or alternative package for waste (e.g., Li battery).
8. State the two types of DOT exemptions and their application to a shipper/offerrer.
9. Apply the packaging requirements for non-DOT regulated PCBs and asbestos.

Module 6: Requirements for Transport

Apply the EPA and DOT hazard communication requirements for a given waste.

1. Identify the marking requirements imposed by EPA and DOT for a given package of waste.
2. Determine the labeling requirement for a given package of waste.
3. Prepare the transport document for a given waste shipment.
4. Select the appropriate placards for a given transport vehicle.
5. Identify the hazard communication exceptions and allowances for a given waste.

Module 7: Controls for Transport

- *Determine authorized vehicle loading configurations for packages of waste.*
- *Identify DOT and EPA reporting requirements.*

1. Determine, if any, the loading requirements and restrictions imposed on a given waste.
2. State when immediate notification to DOT must be made regarding a transport incident.
3. Identify when a written report must be filed to DOT concerning a transport incident.
4. Recognize the security requirements imposed by the DOT on shipments of wastes (e.g., precious metals, universal wastes).