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Fact Sheet

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The New USDOT Registration Program and Printers

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In 2000, the United States Department of Transportation (USDOT) revised its hazardous materials transportation registration program Title 49 CFR Part 107, Subpart G (107.601 - 107.620) by expanding it to include many more small businesses, including those in the printing industry. The registration program is designed to allow USDOT to know and track those companies that are involved with shipping USDOT defined "hazardous materials." The purpose of this fact sheet is to briefly summarize the new registration program.

The USDOT's registration program, which began in 1992, applies to any company that offers (i.e., initiates a shipment) or transports "hazardous materials", including hazardous waste, above specified threshold amounts. Companies that either transport, or offer for transport, hazardous materials above the program's threshold are required to file a registration statement with the USDOT for the registration year in which the shipment(s) takes place and to pay an annual registration fee. Since the fees vary from year to year, please see <http://hazmat.dot.gov/register.htm>

It is important to understand that not all offerors must register. If, as a facility, you ship hazardous waste offsite, then you are offering hazardous materials for transport, and thus may be required to register. For most printers, the question of whether to register will depend on the answer to five questions:

1. What is the hazard class of the hazardous material or waste shipped?
2. Is the material or waste in a bulk or non-bulk package? (Bulk packaging is a single container greater than 119 gallons capacity or weighing 882 lbs or more.)
3. What is the total quantity shipped in a single load?
4. Does a shipment of hazardous material or waste require placarding (see below)?
5. Is the shipment later pumped into a large tanker truck (i.e., more than 3,500 gallons) prior to leaving the printing facility?

Registration Thresholds

The thresholds for registration are based on two specific criteria -- type and amount of hazardous

materials shipped offsite. For printers, the most common hazard classes are:

- 1 Class 3 – Flammable or Combustible* Liquids
- 2 Class 8 – Corrosives
- 3 Class 9 – Other Regulated Materials including hazardous wastes not otherwise listed in another hazard class.

The second criteria are whether or not the shipment is in a bulk or non-bulk containers, and whether or not the shipment requires placarding under DOT regulations. Therefore, a printer must register with the USDOT if your shipment meets any of the following criteria:

<u>Class</u>	<u>Description</u>	<u>Quantity</u>
Class 3	Flammable Liquids	Shipped in bulk containers (such as tanker trucks) or in packages greater than 3,500 gallons. Shipments that require a placard, i.e., over 1,001 pounds per shipment (This is approximately 2 to 3 55 gallon drums of solvents.)
Class 3	Combustible Liquid*	Shipped in tanker trucks greater than 3,500 gallons or in bulk containers (119 gallons or more) over 1,001 lbs total gross weight. Non-bulk shipments greater than 5,000 lbs gross weight. (This is 10 to 12 55-gallon drums depending on total weight of each drum.)
Class 8	Corrosive Liquids	Shipped in bulk containers (such as tanker trucks) or in packages greater than 3,500 gallons. Shipments that require a placard, i.e., over 1,001 pounds per shipment. (This is 2 to 3 55-gallon drums depending on total weight of each drum.)
Class 9	Hazardous Waste*	Shipped any amount in bulk containers or in packages greater than 3,500 gallons. Transports waste in non bulk packages (less than 119 gallons) if a single shipment contains 1,001 pounds or more of one or more classes of hazardous waste that requires placarding. Any quantity transferred to a tanker truck with a capacity greater than 3,500 gallons.

* Note: The definition of a combustible liquid differs if the material is shipped within the United States or outside of the United States. For shipments within the United States, the definition of a combustible liquid is any liquid with no other DOT hazard class and a flashpoint greater than 100°F and less than 200°F. For international shipments, the flashpoint must be greater than 141°F. Liquids with flashpoints below these levels are considered flammable.

Empty Containers

Under the current DOT regulations, empty bulk containers being returned to the vendor for refilling

are to be classified and handled in the same manner as if they were full, unless they have been sufficiently cleaned of residue and purged of vapors to remove any potential hazard or contain a material that is not regulated as a DOT hazardous substance. If the bulk container has not been cleaned, then the weight of the residue and the container are to be counted toward the above thresholds. Non-bulk containers that had flammable, combustible or corrosive materials in them are exempt from placarding requirements. Likewise, empty 12-16 ounce aerosol containers are also exempt as they fall under the limited quantity exemption and are not subject to placarding.

Registration Exemptions

The printer does not have to register for the following waste shipments:

- 1 Nonhazardous wastes as defined by USEPA
- 2 Used oil shipped in non-bulk packaging, if it is combustible and has no other USDOT hazard classification.
- 3 Fluorescent and other mercury containing lamps shipped for reclamation.
- 4 Nonhazwaste dry batteries such as consumer alkaline batteries.
- 5 Large lead-acid batteries such as UPS, vehicle, pallet jack or forklift batteries (Class 8 Corrosive), if total gross weight of batteries shipped is greater than 1,001 lbs if no other hazardous materials are transported in the same vehicle, the batteries are loaded or braced so as to prevent damage and short circuits in transit, any other material loaded in the same vehicle must be blocked, braced, or otherwise secured to prevent contact with or damage to the batteries, and the transport vehicle may not carry material shipped by any person other than the shipper of the batteries.
- 6 A "nonspillable" wet electric storage battery that is protected against short circuits and securely packaged, labeled (including packaging) "NONSPILLABLE" or "NONSPILLABLE BATTERY" if manufactured after September 30, 1995, and passing the vibration and pressure differential pressure tests* without leakage of battery fluid. See footnote on test methods.
- 7 Empty propane canisters, if the total gross aggregate weight is less than 220 lbs.

Multiple Plant and Subsidiary Company Registration

For those printing operations where they may be a part of a larger company with multiple operations or are a subsidiary of a larger holding corporation, a single registration for the "parent" organization may not be sufficient. The following is the definition of a "company" that must register:

Each U.S. Company engaged in a specified hazardous materials activity that is (1) incorporated separately from a parent company, (2) under the majority stock ownership of another company, or (3) a wholly owned or controlled subsidiary of another company, is required to register even when the parent company is also subject to registration.

Summary and Action Plan

While most printers who are small quantity generators of hazardous wastes may not have to register, it is prudent to always keep in mind the classification and amount of wastes that are shipped offsite. Printers can avoid registration if careful consideration is given to the proper classification of wastes in conjunction with the choice of shipping container. Under the DOT regulations, printers can classify their hazardous waste as a Class 9 if the waste does not meet the definition of any other Class, such as flammable or corrosive. Class 9 hazardous wastes in non-bulk containers do not require registration. However, if a waste vendor pumps Class 9 (hazardous wastes) from the accumulation containers into a 3,500-gallon tanker truck, registration would be required. It is important to note that while a printer may not be required to register, they are still considered an offeror of hazardous materials.

Since the shipment of a combustible material requires placarding only when hazard class placarding quantities are exceeded, reclassifying an EPA D001 hazardous waste with a flashpoint below 140°F to a combustible for DOT shipping purposes will also allow for no registration status. It is important to note that this reclassifying approach will only work if the waste is being shipped and disposed within the borders of the United States.

However, the registration requirements apply if a printer offers any one shipment above the thresholds during the year. Printers can preregister for 1-3 years using the USDOT printed form or online at the USDOT website at <http://hazmat.dot.gov/register.htm>. The annual registration period is July 1 through June 30 of the following year.

If you have not registered and you find out that you had a qualifying shipment during a previous year (e.g., during the period July 1, 2002 – June 30, 2003), you are required to “post” register for that period. You must submit the registration form and appropriate fee. Don’t forget to note the proper registration period on the form.

This registration requirement is a federal regulation and printers are not required to register with state USDOT agencies.

* Footnote – Battery Test Methods

Vibration test - The battery must be rigidly clamped to the platform of a vibration machine, and a simple harmonic motion having an amplitude of 0.8 mm (0.03 inches), with a 1.6 mm (0.063 inches) maximum total excursion must be applied. The frequency must be varied at the rate of 1 Hz/min between the limits of 10 Hz to 55 Hz. The entire range of frequencies and return must be traversed in 95±5 minutes for each mounting position (direction of vibrator) of the battery. The battery must be tested in three mutually perpendicular positions (to include testing with fill openings and vents, if any, in an inverted position) for equal time periods.

Pressure differential test - Following the vibration test, the battery must be stored for six hours at 24 °C±4 °C (75 °F±7 °F) while subjected to a pressure differential of at least 88 kPa (13 psig). The battery must be tested in three mutually perpendicular positions (to include testing with fill openings and vents, if any, in an inverted position) for at least six hours in each position.

For more information or to contact someone from PNEAC please visit www.pneac.org and post your request using "Ask PNEAC".

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