

DOT Registration & Security

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Everyone knows that you need special training to ship HazMat or Dangerous Goods, but do you know there may be more things you need to do, to be in compliance?

Based on quantities of Dangerous Goods or Hazardous Waste you ship, your site may need either:

Hazmat Registration with the Department of Transportation (DOT), and/or a **DOT-compliant Security Plan**.

Registration with the DOT is required if you ship any of these at least once per year:

- A) A highway route-controlled quantity of a Class 7 (radioactive) material, as defined in 49 CFR 173.403.
- B) More than 25 kilograms (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material.
- C) More than one liter (1.06 quarts) per package of a material extremely toxic by inhalation (that is, a “material poisonous by inhalation” that meets the criteria for “hazard zone A”.
- D) A hazardous material (including hazardous wastes) in a bulk packaging having a capacity equal to or greater than 13,248 liters (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids.
- E) A shipment in other than a bulk packaging of 2,268 kilograms (5,000 pounds) gross weight or more of one class of hazardous materials (including hazardous wastes) for which placarding is required for that class.
- F) A quantity of hazardous material that requires placarding.

Is Hazardous Waste Included in Item F – “A quantity of hazardous material that requires placarding”? DOT says - All hazardous wastes subject to the Hazardous Waste Manifest Requirements of the U.S. EPA are hazardous materials.

A hazardous waste generator must register if it meets the requirements identified above, items E or F.

What quantity of Hazardous Waste requires Placarding? Typically, this is 1,000 pounds on 1 truck, unless a high-hazard material.

The fees for year 2018-2019 are \$250 for small businesses, and \$2,575 for all others.

What is a Small Business? A site is a “small business” if it does not exceed the size standard from the U.S. Small Business Administration (SBA). This is listed by either sales or population, and this applies to the entire company total, not just your site.

Check your business by NAICS code in the table on the SBA website at:

<https://www.sba.gov/contracting/getting-started-contractor/make-sure-you-meet-sba-size-standards/table-small-business-size-standards>

Whether or not your company classifies as a “small business” will define the fee.

The DOT registration does apply to each site individually, that ships dangerous good above these quantities. So, if you have two sites that need to register, both register separately and pay the fee.

Your site may also need a DOT Security Plan if you offer for transport the following:

- 1) Any quantity of a Division 1.1, 1.2, or 1.3;
- 2) A quantity of a Division 1.4, 1.5, or 1.6 material requiring placarding in accordance with Subpart F of Part 172 of the HMR;
- 3) A large bulk quantity of Division 2.1 material;
- 4) A large bulk quantity of Division 2.2 material with a subsidiary hazard of 5.1;
- 5) Any quantity of a material poisonous by inhalation as defined in §171.8 of this subchapter;
- 6) A large bulk quantity of a Class 3 material meeting the criteria for Packing Group I or II;
- 7) A quantity of a desensitized explosive meeting the definition of a Division 4.1 or Class 3 material requiring placarding;
- 8) A large bulk quantity of a Division 4.2 material meeting the criteria for Packing Group I or II;
- 9) A quantity of a Division 4.3 material requiring placarding in accordance with Subpart F of Part 172 of the HMR;
- 10) A large bulk quantity of a Division 5.1 material in Packing Groups I and II: perchlorates; or ammonium nitrate, ammonium nitrate fertilizers, or ammonium nitrate emulsions, suspensions, or gels;
- 11) Any quantity of organic peroxide, Type B, liquid or solid, temperature controlled;
- 12) A large bulk quantity of Division 6.1 material (for a material poisonous by inhalation see above);
- 13) A select agent or toxin regulated by the Centers for Disease Control and Prevention under 42 CFR Part 73 or the U.S. Department of Agriculture under.

- 14) A quantity of uranium hexafluoride requiring placarding under §172.505(b);
- 15) International Atomic Energy Agency (IAEA) Code of Conduct Category 1 and 2 materials including Highway Route Controlled quantities as defined in 49 CFR 173.403 or known as radionuclides in forms listed as RAM-QC by the Nuclear Regulatory Commission; and
- 16) A large bulk quantity of Class 8 material meeting the criteria for Packing Group I

What is “Large Bulk Quantity”? The term “Large bulk quantity” refers to a quantity greater than 3,000 kg., (6,614 lbs.) for solids or 3,000 liters (792 gal.) for liquids and gases in a single packaging such as a cargo tank motor vehicle, portable tank, tank car, or other bulk container:

What should you do?

- First - review the quantities you have shipped in the last 1-3 years, to see if any shipment was >1,000 lbs.
- Second - check if you are registered:
<https://hazmatonline.phmsa.dot.gov/services/CompanySearch.aspx>
- Third - check (entire) company size at the SBA to see if you are a “Small Business”:
<https://www.sba.gov/contracting/getting-started-contractor/make-sure-you-meet-sba-size-standards/table-small-business-size-standards>
- Fourth - review the DOT Security Plan list to see if you need a security plan.

Please contact EAA if you have any questions. We provide industry-leading focused DOT / IATA training. Also, if you transport any Dangerous Goods in your own company vehicles and have questions, please drop us a line.

Upcoming Deadlines	3/31	- Quarterly discharge monitoring reports for facilities under EPA MSGP	Check out our website for a full list of upcoming dates: www.envaa.com
	3/31	- Facilities subject to 40 CRF 98 Subpart A, reporting of greenhouse gases to EPA	
	4/1	- EPA Air Emissions Inventory: for Class I and Class II	
	4/30	- EPA Title V Quarterly Monitoring Report	

