

Missouri Department of  
**Natural Resources**

## Hazardous Waste Transportation and Compliance Activities

---

Billie Hains, Hazardous Waste Program



---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

## Key transporter laws

- Duties of the Department: 260.375 Revised Statutes of the State of Missouri (RSMo) – Licensing
- Transporter requirements: 260.385 RSMo – licensing, manifests, delivering to permitted or authorized facility, collect and maintain records, allow inspections

---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

## Hazardous waste transporter regulations

- Title 10
- Division 25
- Chapter 6 – Rules applicable to transporters of hazardous waste
- Section 263



---

---

---

---

---

---

---

---

### Commercial Motor Vehicle (CMV)/ Transporter Inspections

- Performed by the Department's (MDNR's) transporter inspector
- Hazardous Waste Program
- Contact: 573-522-9532
- Safety inspections

---

---

---

---

---

---

---

---

### Inspecting a transporter



---

---

---

---

---

---

---

---

### North American Standard Level 1

---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

## Cargo Tank and Other Bulk

North American Standard Cargo Tank and Other Bulk Packagings Inspection Procedure



Commercial Vehicle Safety Alliance

---

---

---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

## Hazardous Materials

North American Standard Hazardous Materials/Transportation of Dangerous Goods Inspection Procedure



Commercial Vehicle Safety Alliance

---

---

---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

## Common Out-Of-Service: Defective brake lining conditions, front steering axle




---

---

---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

Violation: Brake hose/tubing damage / chaffing



---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

Out-Of-Service: Tire missing tread, front steering axle



---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

**The Goals**

- Protect the public
- Reduce CMV incidents
- Ensure uniform inspections
- Promote CMV safety



---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

- Questions about CMV inspections?




---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

**Uniform Hazardous Waste Manifest**




---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

**Manifest Submittal to MDNR**

- Missouri requires an original copy of the manifest to be submitted to the MDNR by all in-state and out-of-state Treatment, Storage, or Disposal Facilities (TSDFs) in accordance with 40 CFR 264.71(e)

---

---

---

---

---

---

---

---

### Manifest Review

- Currently over 100 TSDFs throughout the nation submit manifests to MDNR
- Approximately 180,000 manifests are received by MDNR each year
- Review:
  - EPA identification number, emergency response number, generator name and address, transporter, transporter EPA ID number, TSDF, waste, amount of waste, waste codes, discrepancies, dates

---

---

---

---

---

---

---

---

### Issues Found

- Unlicensed and illegal transporters
- Fake and illegal TSDFs
- Unregistered generators
- Generators that are registered incorrectly

---

---

---

---

---

---

---

---

### Questions about manifest reviews?



---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

### Transporter Licensing

- Missouri's Hazardous Waste Transporter License goes through two Missouri agencies



MODOT: confirms the carrier meets the insurance and U.S. DOT requirements for the materials the carrier is applying to transport

---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

### MDNR Licensing Background Work

- MDNR environmental background check:
  - Enforcement information (RCRAInfo, ECHO, other state enforcement information, MDNR files, broad web search)
- General information
  - Google maps, assure EPA ID number is real and has a matching address, terminals and transfer stations, assure transport company has a TSDf that can receive their waste

---

---

---

---

---

---

---

---

Missouri Department of  
**Natural Resources**

### Missouri Hazardous Waste Transporters

- Every Missouri hazardous waste transporter is different
- There are multiple types of material that a transporter may apply to haul




---

---

---

---

---

---

---

---

### Transporter Requirements

- Each material has different requirements that a transporter must meet before the license is approved
- 3 main categories of hazardous waste transported in Missouri:
  - Hazardous Waste
  - Used Oil
  - Infectious Waste

---

---

---

---

---

---

---

---

### Missouri transporter licenses

- Currently there are approximately 250 licensed transporters in Missouri. They include:
  - Hazardous waste transporters
  - Infectious waste transporters
  - Used oil transporters
  - Emergency clean up companies
  - Government agencies

---

---

---

---

---

---

---

---

### Important Resources

- To apply for a Missouri hazardous waste transporter's license
- <http://www.modot.org/mcs/Hazardous/index.htm>
- Current Missouri licensed transporter's list
- <http://dnr.mo.gov/asp/hwp/transporter/trans-list.asp>
- EPA's national enforcement information database for the public
- <http://www.epa-echo.gov/echo/>

---

---

---

---

---

---

---

---

### More Important Resources

- Links to Missouri regulations: Transporter, Used Oil, PCB, and Infectious Waste respectively
- <http://www.sos.mo.gov/adrules/csr/current/10csr/10c25-6.pdf>
- <http://www.sos.mo.gov/adrules/csr/current/10csr/10c25-11.pdf>
- <http://www.sos.mo.gov/adrules/csr/current/10csr/10c25-13.pdf>
- <http://www.sos.mo.gov/adrules/csr/current/10csr/10c80-7.pdf>

---

---

---

---

---

---

---

---

### More Important Resources

- Pipeline and Hazardous Materials Safety Administration
- <http://www.phmsa.dot.gov/>

---

---

---

---

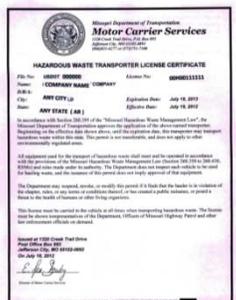
---

---

---

---

- Example of a license that each licensed hazardous waste transporter carries



---

---

---

---

---

---

---

---

- Questions?

---

---

---

---

---

---

---

---