

Transporting Hazardous Waste

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Introduction

To transport hazardous waste in Wisconsin, generated by either large or small quantity generators, you must have both a valid U.S. Environmental Protection Agency (EPA) ID number and a hazardous waste transportation service license issued by the Wisconsin Department of Natural Resources (DNR). Hazardous waste transportation requirements are described in [ch. NR 663 Wisconsin Administrative Code](#).

A transporter is anyone who engages in the off-site transportation of hazardous waste by air, rail, highway or water. The waste must also be tracked using a uniform hazardous waste manifest.

A very small quantity generator (VSQG) may self-transport hazardous waste without a transportation license or a hazardous waste manifest.

EPA ID number

To transport hazardous waste in Wisconsin, the transporter must first obtain an EPA ID number, which requires transportation service to submit a *Notification of RCRA Subtitle C Activities (Site Identification Form)* [EPA Form 8700-12] to notify the DNR of their waste activity and location.

Obtain an EPA ID number - Fillable paper form

Instructions can be accessed by searching for “hazardous waste forms” at dnr.wi.gov. The EPA Form 8700-12 is located at the end of the instruction booklet. Note that some sections of the paper form currently **do not** apply in Wisconsin, specifically items 13 through 15, for Episodic Generation, LQG Consolidation of VSQG Hazardous Waste, and Notification of Hazardous Secondary material (HSM) activity. For assistance with the paper form, or to submit completed applications, contact your [regional environmental program associate](#) for your county (see DNR contact information at the end of this document).

Obtain an EPA ID number - Electronic notification

EPA Form 8700-12 can be accessed via RCRAInfo and the MyRCRAid application. This application allows facilities to prepare and submit initial and subsequent notification forms to the state. Registration to use the electronic notification requires the transportation service to set up an account in RCRAInfo. Go to <https://rcrainfo.epa.gov/> and select RCRAInfo Version 6, set up an account, register for electronic signature permission and choose the “MyRCRAid” option. This is a person-specific account and should not be shared among employees.

The [state RCRAInfo administrator](#) will approve you as a user of the MyRCRAid application in RCRAInfo. Read the user options carefully to choose the one that best fits your use. Fill out the form in RCRAInfo and use your electronic signature to submit the [EPA Form 8700-12](#).

Note: If you are also registering in preparation to use EPA’s e-Manifest system, it is recommended that two people register as “site managers”. The site managers will have the ability to assign additional user permissions for your company and staff without assistance from DNR or EPA.

Hazardous waste transportation license

Transporters must hold a valid hazardous waste transporter license when transporting hazardous waste within or through Wisconsin. If a company has vehicles based in Wisconsin (i.e., they dispatch vehicles from that location) the facility, as instructed above, should fill out EPA Form 8700-12 to notify the DNR of their transporter and/or transfer facility activities. Each separate transportation location, including 10-day hazardous waste transfer facilities, should have obtained a WI EPA ID number as part of the notification process as it is a locational number for an activity taking place in Wisconsin. However, the corporate EPA ID number can be used on the manifests as it identifies a transporter not a location.

NR 663.13(1)(b), Wis. Adm. Code, states: Each location at which a person transporting hazardous waste bases transport vehicles shall be licensed as a separate transportation service. An application form and fee for each transportation service shall be submitted to the regional office of the department in the region where the transportation service is located.

Multiple regional and/or terminal operations: An individual application form and fee is required for all individual truck/transfer locations that are based in Wisconsin. Submit applications and fees to the DNR [regional environmental program associate](#) where the transportation service or activity is located.

Out-of-state Transporters: A person who transports hazardous waste into or through Wisconsin, but whose operation is based out-of-state, must submit a license application form and fee to the DNR [regional environmental program associate](#) where the hazardous waste transportation activity is concentrated.

To obtain a transportation license, go to the DNR webpage at dnr.wi.gov and search for "[Waste facility and transporter licenses](#)" and select the "How to apply" tab. There you will find the *Hazardous waste and/or PCB Waste* licensing cover letter and the forms listed below.

- Hazardous Waste and/or PCB Waste Transportation License (Form 4400-086)
- Social Security Number/FEIN Collection Request (Form 9400-568)

Licensing fee and renewals

The \$400 Hazardous Waste and/or PCB Transportation Licensing fee covers a licensing period from Oct. 1 to Sept. 30 of the following year. All applicants shall renew this license annually by the date specified by the DNR on the emailed renewal form.



Make sure the following email address is considered a safe address (not junk or spam) as \$150 late fee is assessed for late renewals: dnrwalicenserenewals@wisconsin.gov

Hazardous waste manifest requirements

Hazardous waste must be accompanied by a uniform hazardous waste manifest that is properly signed by the generator and the transporter. **Manifest** means the shipping document, which will be the EPA Form 8700-22 (a 5-page document) and, if necessary, EPA Form 8700-22A, or an electronic manifest.

*A uniform hazardous waste manifest or EPA's electronic manifest system must be used for shipments of hazardous waste and for PCB waste. Do **not** use these types of manifests for the shipment of non-hazardous waste.*

The manifest shall be originated and/or signed by the generator or offeror according to the instructions in the appendix to 40 CFR parts 262 and applicable requirements of NR 662-665, Wis. Adm. Code.

EPA's Hazardous Waste e-Manifest System is an electronic database that can produce forms, reports and procedures designed to track hazardous waste from the time it leaves the generator facility where it was produced, until it reaches the off-site waste management facility that will store, treat or dispose of the hazardous waste. The system allows the waste generator to verify that the waste has been properly delivered, and that no waste has been lost or unaccounted for in the process.

Hybrid manifests start out as a paper form and the original data is entered into the e-Manifest System by either the transporter or the TSD/receiving facility. It is then considered electronic and cannot go back to paper form, and all signatures from that point on must be electronic.

Transporters can submit either a signed paper copy or an electronic form through the EPA's e-Manifest System to the treatment, storage and disposal (TSD)/receiving facility. Transporters should work with the TSD/receiving facility to determine how they will be transitioning from paper to electronic manifests. During the initial transition period, it is expected that generators will continue to receive a paper copy manifest at the time the hazardous waste is picked up at their facility. Over time, the TSD/receiving facility will work with their transporters to begin using the electronic system from the initiation of the shipment onward. This gradual transition will allow generators and transporters time to learn more about how the system works and to get registered to use the system.

After the e-Manifest System is activated on **June 30, 2018**, the TSD/receiving facility is required by EPA to add the final manifest to the e-Manifest database. All the handlers, **including transport drivers**, must register to gain access to the e-Manifest System to prepare, review, sign and print manifests, and for recordkeeping purposes.

It is recommended that transportation services **register two site managers** who can then assign user roles for use of the e-Manifest System. This will avoid a lag in access to the system should personnel change over time. There are five user roles that can be assigned by the site manager: preparer, reviewer, certifier, viewer and broker. Note: Broker user roles will not be available at the initial launch, so brokers may be assigned as the preparer role. *These assignments can be made prior to the launch date.* Transport drivers will most likely be certifiers, as they will be signing off on the manifest.

To sign up to use EPA's e-Manifest System, all transport drivers must set up an account in RCRAInfo. Go to <https://rcrainfo.epa.gov/> and choose RCRAInfo Version 6, set up an account and register for electronic signature permission. This is a person-specific account and should not be shared among employees. Each employee that will need access to the e-manifest system and sign e-manifests should have their own electronic signature permission.

The [state RCRAInfo administrator](#) will provide access for site managers in the e-Manifest application in RCRAInfo. Site managers should read the user options carefully to choose the one that best fits the employee's use. A site manager can log in to RCRAInfo to assign permissions to other company users (preparer, viewer, certifier) and other handlers (transporters and TSD/receiving facilities) that may need to sign or correct the e-manifest. Once all the permissions are granted the e-Manifest system is set up for your use. Before transport drivers begin accessing the EPA's e-Manifest System, contact your TSD/receiving facility to determine how they will be utilizing the e-Manifest System.

Note: RCRAInfo will not allow access to the e-manifest system beyond the initial registration until after June 30, 2018, and then the system will be a work in progress. Correction capabilities will not be available in the system for generators and transporters until fall 2018. While VSQGs are not required to use a manifest, if they choose to manifest their wastes, the VSQG must obtain an EPA ID number. Some transporters request VSQGs obtain an EPA ID number to manifest all wastes they transport for tracking purposes.

Transporters must ensure that copies of the manifests meet the following requirements of NR 663, Wis. Adm. Code, including:

- signed by the generator;
- signed and dated by the transporter at the time waste is accepted from the generator;
- a paper manifest or a printed copy of the electronic manifest must always accompany the waste;
- signed and dated by all intermediary transporters and the facility that receives the waste; and
- transporter copies must be kept at the transfer facility or be accessible electronically for review for three years.

If the transporter is unable to deliver the waste to the TSD/receiving facility, alternate facility, or another transporter indicated on the manifest, the transporter must contact the generator for further direction. The transporter must then revise the manifest, obtain a second manifest, or return the waste to the generator.

Additional transporter requirements



Properly package, label, and mark the waste and placard the vehicle. Before transporting hazardous waste or offering hazardous waste for transportation off-site, the generator, or transporter on their behalf, shall package the waste in accordance with the applicable U.S. DOT regulations for packaging under [49 CFR Part 173, 178 and 179](#). Before transporting, hazardous waste shall be labelled, marked and placard in accordance with U.S. DOT regulations under [49 CFR part 172](#).



Secure containerized waste in the vehicle to prevent movement. Secure containers to prevent shifting, damage, and potential spills.



Equipment operators must be trained. Each transportation service must have an employee training program for hazardous waste handling and equipment operators. Topics in the program must include the problems and potential hazards posed by the transportation and disposal of hazardous waste, and equipment inspection techniques. Training records must be kept for three years.



Vehicles and equipment must be periodically inspected. Each transportation service must have an inspection program for hazardous waste handling and transportation equipment. The program must include a schedule for equipment inspection and a checklist of specific areas or items to inspect. Records of when the equipment was inspected, any problems observed, and any maintenance conducted must be kept for three years.



Transport by rail or water. Hazardous waste transporter requirements are slightly different for rail or water transport, or when a transporter mixes waste with different shipping restrictions. For more details consult, NR 663, Wis. Adm. Code, or contact the DNR Hazardous Waste Contact for the county in which the transportation activity is centered, or your office is located.



Properly report and respond to hazardous waste discharges.

If a discharge of hazardous waste occurs during transportation...

1. Call the Wisconsin 24-hour number emergency spill hotline: **1-800-943-0003**.
2. Review the information on the DNR's "What is a spill?" web page at <https://dnr.wi.gov/topic/Spills/Define.html>. Comply with the hazardous substance spill requirements in section 292.11, Wisconsin Statutes and ch. NR 706, Wis. Adm. Code.
3. Give notice as required by 49 CFR 171.15 to the National Response Center at **1-800-424-8802** (toll free) or **202-267-2675**. Notify as soon as practical but no later than 12 hours after the occurrence.
4. Report in writing as required by 49 CFR 171.16. Electronic Hazardous Material Incident Reporting can be conducted through the [Pipeline and Hazardous Materials Safety Administration](#) website.

DNR contact information

Mailing address: DNR Waste & Materials Management Program, PO Box 7921 Madison, WI 53707

Email: DNRWasteMaterials@Wisconsin.gov

Disclaimer: *This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.*

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WISCONSIN DEPARTMENT OF NATURAL RESOURCES
NOTICE OF FINAL GUIDANCE & CERTIFICATION

Pursuant to ch. 227, Wis. Stats., the Wisconsin Department of Natural Resources has finalized and hereby certifies the following guidance document.

DOCUMENT ID

WA-20-0137-C

DOCUMENT TITLE

Transporting Hazardous Waste

PROGRAM/BUREAU

Waste and Materials Management

STATUTORY AUTHORITY OR LEGAL CITATION

Ch. 291, Wis. Stats.; chs. NR 660-679, Wis. Adm. Code

DATE SENT TO LEGISLATIVE REFERENCE BUREAU (FOR PUBLIC COMMENTS)

01/21/2020

DATE FINALIZED

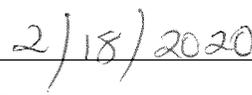
02/19/2020

DNR CERTIFICATION

I have reviewed this guidance document or proposed guidance document and I certify that it complies with sections 227.10 and 227.11 of the Wisconsin Statutes. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is not explicitly required or explicitly permitted by a statute or a rule that has been lawfully promulgated. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is more restrictive than a standard, requirement, or threshold contained in the Wisconsin Statutes.



Signature



Date