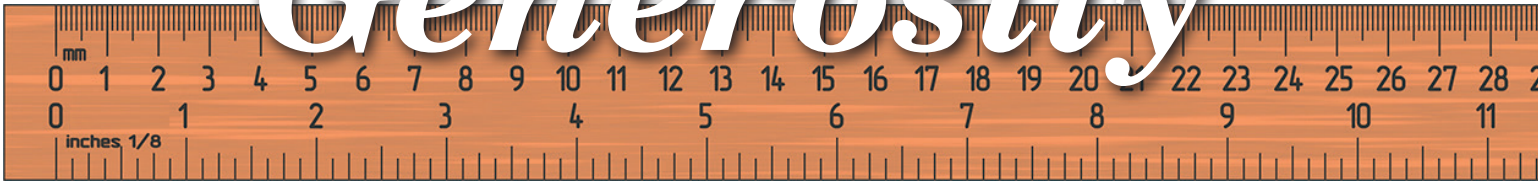


Generosity



Sometimes size does matter; such as in the case of generosity, apartments, and UN numbers on containers. How big does a proper shipping name have to be on a non-bulk container of hazardous material or waste? No one cares as long as the proper shipping name is **legible** and in **English**. But the size of the material's UN identification number marking is a different matter.

The Department of Transportation Regulations require shippers of bulk containers, of hazardous material and waste, to ensure that the ID numbers are at least 100 mm (3.9 in.) tall and 6 mm (0.24 in.) wide for **rail cars**; at least 25 mm (1 inch) tall and 4 mm (0.16 in.) wide for **portable tanks and totes**; and at least 50 mm (2 in.) high and 6 mm (0.24 in.) wide for **Cargo tanks and other bulk packagings not mentioned above**.

The bulk container marking requirements have not changed in years; it's the non-bulk (drums and boxes) container marks that are changing. As of January 1, 2017, Section 172.302 will require the UN/NA identification marks to be at least 12 mm (0.47 in.) high for non-bulk containers (under 119 gallons for liquids, 882 pounds for solids or 1000 pounds water capacity for gases). Smaller non-bulks (under 8 gallons, 66 pounds or 16 gallons water capacity), must have UN/NA number markings of at least 6 mm (0.24 in.) high. Even smaller packagings must have appropriately proportioned markings. So get moving, because you have just over two weeks and, of course, this includes all non-bulk shipments of hazardous waste, as well as hazardous material.

Over the last few years, most product manufacturers have already taken care of this new marking requirement. So it is not so much for your products that I worry; it is your containers of hazardous waste, especially for those of you shipping hazardous waste for disposal and using HAZARDOUS WASTE LABELS. First of all, I hate the term, HAZARDOUS WASTE LABEL, because there is no such thing as a hazardous waste label. It's a mark, not a label. Look it up under Pre-Transport Requirements in 40 CFR Section 262.32 of the EPA Hazardous Waste Regulations.

I have vivid memories of my father pasting together his first HAZARDOUS WASTE LABEL, over 35 years ago in the late-1970's, with his regulations, rubber cement and X-Acto knives. The new EPA Hazardous Waste Regulations had just become law and he was preparing to train all the new EPA hazardous waste inspectors on the DOT Hazardous Materials Shipping Regulations; it was his first big contract. We were up in the Muskokas, in a summer cottage on the shores of Lake Joseph. We were all off from school, spending the summer in a small 1 bedroom apartment in Toronto. Peter, Tim, Matt and I were (even back then) all over 6 feet and almost 200 pounds each, so it was a tight squeeze. Tempers would flare.

So, a good friend of my father, Laurie Kingsland, his wife Anne, and three beautiful, boating, sailing, waterskiing, pick-up truck driving daughters, Janet, Linda, and Kelly, came to our rescue. Laurie

was always very generous, loved my father, and couldn't stand the thought of us all cooped up in a tiny city apartment. So, he gave my dad one of their family cottages to use for all those summers, while we were still in school.

This was around the time that dad was trying to buy Transportation Skills Programs, Inc., which still runs our seminar today, from McGraw-Hill. He was broke, divorced and trying to round up investors, so having a cottage "up north" was for us a big deal. I have vivid memories waking up early every morning to the smell of warm Molson Canadian, Benson and Hedges cigarette butts, coffee and rubber cement, then watching him as he pasted and re-pasted up the container labels and marks his company sold, including THE HAZARDOUS WASTE LABEL.

Quite simply, some of the hazardous waste container labels don't have enough room to meet the new UN/NA Number height requirement. Older versions of the label were meant to be filled out on a typewriter, and I don't know of any typewriters that can meet the height requirements. Another problem can be that some of the labels don't have enough distance between the preprinted lines on the labels to display the numbers large enough, so people are asking me if they should try to print the UN Number over, or on top of, the preprinted lines. Good try, but the DOT requires all container marks and labels to be on a background of contrasting color, I believe that running the UN number thru or over the preprinted lines on the labels could pose a problem for some inspectors.

As many shippers of hazardous material and waste know, DOT is obsessive about the sequence of the hazardous materials information on a shipping paper. DOT demands the shipping name in the basic description, the basic description inside the shipping description and the shipping description on a shipping paper. But on the shipping paper, the most important part is the basic description (UN #, Proper Shipping Name, Hazard Class & Packing Group), which must be displayed in sequence.

But there is no basic description or sequence on the container. DOT doesn't care how or where the required information appears on the container; only that it is on a background of contrasting color together, not on the bottom of the container and displayed on the same surface as the hazard class labels. DOT does not have a size requirement for the proper shipping name or technical names to be .47 inches or 12 mm high, only the container's UN numbers.

So on your hazardous waste label, you can still type the RQ notation, the shipper's name, waste codes and constituents, but you might want to buy or create your own separate mark or label to display the .47 inch (12 mm) UN number on your non-bulk containers of waste alongside those other marks. This will give you a chance to still use those old hazardous waste labels in your inventory well after the transition date of January 1, 2017 or until they run out. Just don't buy any new hazardous waste labels unless they have enough room to display all the container marks in the appropriate size.

Either by design or dumb luck, when we last updated our hazardous waste labels, we included enough room for this change. It is tight, but there is enough room to display the UN Numbers correctly. But to be honest, neither the DOT marks (shipping name and UN number) nor the EPA marks (waste codes, date accumulation begins and the words HAZARDOUS WASTE) have to be displayed on a label, they are marks. And since they are different marking requirements, they would not even have to appear on the same label, only on the same surface.

You can stamp, paste or stencil the material's UN number on the containers as long as they are the

right size, legible and on the same surface as the DOT shipping name information and 4 x4 inch hazard class labels.

OSHA has their GHS pictograms with their 6-part container label for hazardous chemicals to protect workers, DOT has labels and marks for hazardous materials in transportation, but I am pretty sure that the Federal EPA Requirements in 262.34-Accumulation Times currently only require containers to be marked with the words “Hazardous Waste” and the date accumulation begins when in storage in your plant, excluding California, Pennsylvania and a few other states.

This, of course, will change under the Generator Improvements Rule finalized on November 28, 2016 and with an effective date of May 30, 2017 (to be discussed in an upcoming blog). After this date, in addition to the words “Hazardous Waste” and the date accumulation begins, under the SQG, LQG and Satellite Accumulation Regulations, generators must add an indication of the hazards of the contents. Examples of acceptable methods of doing this are: applicable hazardous waste characteristic(s) (ignitable, reactive, corrosive, toxic); DOT labeling or placarding; hazard statement or pictogram under OSHA GHS; or chemical hazard label under NFPA.

So, if you’re not sure how tall and wide, where or when your pictogram, label or mark would, could or should be correctly displayed for your material, call write or email us your question. Thank you for your readership, input and support.

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