

DOT Registrations for Shippers of Hazardous Materials

If your company ships hazardous materials, including hazardous waste, you most likely need a registration with the Department of Transportation (DOT). A common misconception is that only carriers or transporters of hazardous waste need to register with the DOT, but that is not the case. All hazardous wastes subject to the Hazardous Waste Manifest Requirements of the U.S. Environmental Protection Agency are considered hazardous materials. Under the regulation, 49 CFR Part 107, Subpart G - Registration of Persons Who Offer or Transport Hazardous Materials, registration and associated fees are required for anyone who **offers** for transportation in foreign, interstate or intrastate commerce any of the following:

- A highway route-controlled quantity of a Class 7 (radioactive) material;
- More than 25 kg (55 lb) of a Division 1.1, 1.2, or 1.3 (explosive) material;
- More than one L (1.06 qt) per package of a material extremely toxic by inhalation;
- A shipment of a quantity of hazardous materials in a bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gal) for liquids or gases or more than 13.24 m³ (468 cf³) for solids;
- A shipment in other than a bulk packaging of 2,268 kg (5,000 lb) gross weight or more of one class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required for that class, under the provisions of 49 CFR Part 172 Subpart F; or
- A quantity of hazardous material that requires placarding, under provisions of 49 CFR Part 172 Subpart F.

The hazardous material requirement above that usually applies is the last one, "*quantity of hazardous material that requires placarding*", which does include hazardous waste. Your organization should review its hazardous material and waste shipments to see if 49 CFR Part 107 Subpart G applies. If it does, the registration process can be completed online under the DOT's Pipeline and Hazardous Materials Safety Administration (PHMSA) [<https://phmsa.dot.gov/hazmat/outreach-training/registration-program>].

Affinity can assist you in this determination as well as help you in the registration process. Please contact us if you have any questions or need help in determining your applicability.