Wolcott

21-0098

From: INFOCNTR (PHMSA)
To: Hazmat Interps
Subject: FW: Prohibited Markings
Date: Monday, October 18, 2021 1:08:45 PM
Attachments: image002.png

Hello Hazmat Interps,

Below is a request for letter of interpretation.

Thanks,

Jonathon, HMIC

From: tim.carter@dominionenergy.com <tim.carter@dominionenergy.com>
Sent: Friday, October 15, 2021 1:44 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: RE: Prohibited Markings

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Mailing address for a formal interpretation if necessary:

Dominion Energy
120 Tredegar Street
Clearinghouse, 4th Floor
Richmond, VA 23219

Attention: Tim Carter

Thanks for looking into this in such a quick manner.

Tim

Tim Carter
Environmental Consultant
Office: (304) 624-2223
Mobile: (304) 669-0675

From: Tim Carter (Services - 6)

Sent: Thursday, October 14, 2021 11:50 AM
To: phmsa.hm-infocenter@dot.gov
Subject: Prohibited Markings

Dominion Energy frequently generates RCRA hazardous wastes at VSQG facilities.

While being accumulated on-site (before transportation) in non-bulk containers, Dominion uses Hazardous Waste markers as a Best Management Practice to identify the material and identify the generation date, etc.

We realize these markers are not required, but are allowed by RCRA, while accumulating VSQG wastes.

Dominion chooses to ship VSQG RCRA hazardous waste on a uniform hazardous waste manifest, which is not prohibited by the DOT, and utilizing the proper DOT Shipping Description for any material that is deemed to be a hazardous material. We are careful not to use the word "waste" within any shipping name for wastes that are not required by EPA to be manifested.

Questions:

1. When VSQG waste is offered for shipment in non-bulk containers is it a requirement to remove "Hazardous Waste" markers from the drum?

2. During transportation would marking a VSQG waste in non-bulk containers with the words "hazardous waste" be a violation of 49 CFR 172.303?

3. During transportation would marking a VSQG waste in non-bulk containers with the word "waste" be a violation of 49 CFR 172.303?

Thank-you for your consideration.

Tim Carter
Environmental Consultant
Office: (304) 624-2223
Mobile: (304) 669-0675

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