

# Sustainability At Work

# PACKAGING GUIDELINES

Tradebe works closely with customers to ensure that hazardous waste shipments and packaging are in compliance with the Department of Transportation (DOT) container regulatory requirements. DOT regulations 49 CFR 173.24(b) and (b)(1) state in part "each package used for the shipment of hazardous materials…be designed, constructed, maintained, filled, its contents so limited, and closed, so that under condition normally incident to transportation… there will be no identifiable (without the use of instruments) release of hazardous materials to the environment." Also added on July 31, 2003, DOT's final rule HM215E which included the addition of 173.24(b)(4) which states "there will be no hazardous material residue adhering to the outside of the package during transport." Hazardous waste by definition is a hazardous material; therefore, this regulation applies to the hazardous waste and directly impacts hazardous waste generators and transporters.

Simply stated, waste containers offered for shipment must be clean and undamaged. Hazardous material must not be allowed to spill and accumulate on the outside of any package or container (drum, IBC, Tank Truck, etc.). To ensure compliance for all parties, dented containers or containers with waste residue on the outside may require overpacking or other special handling requirements.

We encourage you to review your container management practices at this time. Additionally, please ensure all employees handling hazardous waste are trained properly on how to fill and prepare hazardous waste containers for shipment.

As your waste management provider, Tradebe is committed to providing excellent customer service and expert management of hazardous waste. Please visit our website at www.tradebeusa.com for more information on container management and access to DOT training. We appreciate your business. If you have any questions, please contact your Tradebe Account Manager or Customer Service Representative.

### Pallet Integrity is a vital component of environmental health and safety compliance.

A sound structural pallet will ensure the containers create a stable and safe stacking configuration.

Drums and boxes transported and stored on stable and securely-structured pallets will minimize the risk of unintentional spills and releases of hazardous waste.



#### $\mathbf{\Sigma}$ COMPLIANCE > PACKAGING GUIDELINES

### ACCEPTABLE

Outside of container is free from liquid or dried residues. Any spilled material must be removed from contained prior to shipment.

Container must be in good condition with sides and top free from residue, liquid, sludge, or dried waste.

Information on hazardous waste label and DOT diamond must correspond.

Drum is in good condition with no holes, distortions or dents.

Drum top is in good condition with a tight fitting lid.

Locking ring bolt in the down position with nut aligned correctly and be the appropriate size per manufacturers testing.

Container top and sides are free from any waste. Only dry solids may be shipped in cubic yard boxed. Boxes must be in good condition.



Waste residue on container outside is unacceptable.



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Labels on container must not conflict.

Drums cannot be transported with

Only dry solids are acceptable for

transport in boxes unless specific

leakage or sloshing could occur.

packaging allows for liquids. Possible

integrity of the container.

rust, holes, dents, creases, cracks, or distortion that would compromise the













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NOTE: IT IS TRADEBE'S POLICY THAT ALL NON-HAZARDOUS CONTAINERS REFLECT THE SAME CONDITIONS AS ABOVE.













