EBC Site Remediation and Redevelopment Program

Transportation Documentation & E-Manifesting: Liability, Responsibility, and You
Welcome to E. L. Harvey & Sons, Inc.

Ben Harvey

President
E. L. Harvey & Sons, Inc.
Introduction

Max Forsythe

Program Co-Chair & Moderator

Business Development Manager

National Response Corporation (NRC)
E-Manifests, Hazardous Waste Manifests, Proper Shipping Names, RQ’s

Steve Cross

*Strategic Accounts Manager*

*Heritage Environmental Services, LLC*
E-Manifesting & Shipping Paperwork Details

Sept. 11, 2018
Topics for Today!

- E- Manifesting – Where are we today
- Hazardous waste manifests
- Proper Shipping Names
- DOT Hazardous materials
- RQ’s
E-Manifests

• Commenced June 30, 2018
• No Opt Out Option exists
• Manifest required? – Pay the fee
  • Includes PCBs
  • Includes State Regulated waste
• Transporter MUST have a printed shipping document
  • Emergencies
  • Tablet based system – Driver injured can’t log in or tablet damaged?
System Features

40 CFR 262.24

• Web portal provided by EPA to use the system
  • Direct interfaces for third party software access
• System still under active development
  • Load test 6/28/18
• System integrates with
  • RCRAInfo for registration
  • CDX for signature management (think CROMERR)
**User Roles/Permissions** 40 CFR 262.24

- **Site Manager**: facility gatekeeper
  - Administers authorized users for a site
  - EPA recommends 2 per facility
  - Electronic signature (e-sign)
  - Administer user sub accounts
- **Certifier**: full authorization, plus e-sign
- **Preparer**: view, add and modify
- **Viewer**: only able to view information in system
Best Practices

• Encourage at least 2 people in compliance management register in the RCRA Info portal in the Site Manager role
  • Will be required to:
    • Administer sub-user accounts (not available)
    • E-sign and correct manifests
    • Assign broker privileges (not available)
    • See manifests as soon as they are posted (vs. waiting 90 days for public availability)
E-Manifests

- CROMERR signatures
  - Cross-Media Electronic Reporting Rule
- New 5 - Page Manifest
  - 1\textsuperscript{st} Page – (Top Page) – TSD Facility copy to EPA
  - 2\textsuperscript{nd} Page – Facility returns to Generator
  - 3\textsuperscript{rd} Page – Facility retains copy
  - 4\textsuperscript{th} Page – Transporter copy
  - 5\textsuperscript{th} Page – Generator’s copy kept when shipment initiated.
- Old 6-page manifests can be used until supply is exhausted
<table>
<thead>
<tr>
<th>Type</th>
<th>Option</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full Electronic</td>
<td>1</td>
<td>Electronic from start to finish</td>
</tr>
<tr>
<td></td>
<td></td>
<td>All parties registered for e-signature</td>
</tr>
<tr>
<td>Hybrid Electronic</td>
<td>2</td>
<td>Generator uses paper, transporter digitizes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Transporter and TSD register</td>
</tr>
<tr>
<td>Data plus Image</td>
<td>3</td>
<td>Paper until TSD, TSD uploads data and image</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only TSD must register</td>
</tr>
<tr>
<td>Image Only</td>
<td>4</td>
<td>Image, but no data, uploaded, registration unknown</td>
</tr>
<tr>
<td>Mailed Paper</td>
<td>5</td>
<td>Mail to EPA, no registration</td>
</tr>
</tbody>
</table>
E-Manifests

- TSD is responsible to:
  - Upload an image of the manifest
  - Enter all the data
- TSD pays the fees from EPA
- All manifest data is stored by EPA
- Certain P & U waste will be “Scrubbed”
  - CFATS
  - Chemical Facility Anti Terrorism Standards
- 90 days before manifest data is available to Public
E-Manifests TidBits

• Additional Transporters
  • Documented “agreement / understanding” between generator & transporter
  • Always there in regs.; now being scrutinized by EPA
  • Doesn’t affect emergency situations

• E-Manifest doesn’t replace or eliminate biennial reports
  • On EPA’s to do list for the future

• Visit EPA’s Manifest Program webpage
  • [www.epa.gov/e-manifest](http://www.epa.gov/e-manifest)
Important News & Updates
Massachusetts has moved to a pair of U.S. Environmental Protection Agency (EPA) online tools that make compliance with hazardous waste management regulations easier:

- **myRCRAid** for obtaining generator identification numbers (EPA IDs), and
- **e-Manifest** for documenting and tracking shipments electronically.

Using **myRCRAid** and **e-Manifest** means less paperwork, faster processing times, and more certainty for you.

**Please Note:** If you currently use a state-specific generator identification number beginning with “MV” to ship hazardous waste, you will need to obtain a new, *properly formatted EPA ID before using e-Manifest*. You may do this at no cost through **myRCRAid** after creating a RCRAInfo account.
### Hazardous Waste Manifest

- When you sign, what are you signing?
- Legal Court document

<table>
<thead>
<tr>
<th>Generator’s/Offeror’s Printed/Typed Name</th>
<th>Signature</th>
<th>Month</th>
<th>Day</th>
<th>Year</th>
</tr>
</thead>
</table>

15. **GENERATOR’S/OFFEROR’S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.

I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.
Hazardous Waste Manifest

- PCB shipment must be in Kilograms (K)
- Mixture added to shipping name (PCBs and Soil)
- 49CFR172.101 Table – PG II,
- Special Provisions # 140 – Authorizes PG III for highway shipment

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td>RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID, MIXTURE, 9, PGIII, (PCB REMEDIATION WASTE), ERG#171, (RQ = 1 LB)</td>
<td>1</td>
<td>DT</td>
<td>20000</td>
<td>K</td>
</tr>
</tbody>
</table>
Proper Shipping Names

• When do you know if what you’re shipping is a Hazardous Material that requires a Proper Shipping Name, etc.?
• Simple for RCRA Hazardous waste
• Simple for TSCA regulated PCBs
• What about < 50 ppm PCBs in soil?
• Or non-RCRA hazardous waste?
• Do you have a Reportable Quantity (RQ) if a spill occurred?
• RQ’s range from 1 Lb. to 5,000 Lbs.
**Proper Shipping Names**

- Is the “contaminant” listed in the 172.101 Table 1?
- If Yes, then it is a hazardous substance.
- Does that contaminant have a RQ?
- RQ = Reportable Quantity

**Table 1 to Appendix A—Hazardous Substances Other Than Radionuclides**

<table>
<thead>
<tr>
<th>Hazardous substance</th>
<th>Reportable quantity (RQ) pounds (kilograms)</th>
</tr>
</thead>
<tbody>
<tr>
<td>POLYCHLORINATED BIPHENYLS</td>
<td>1 (0.454)</td>
</tr>
<tr>
<td>Potassium arsenate</td>
<td>1 (0.454)</td>
</tr>
<tr>
<td>Potassium arsenite</td>
<td>1 (0.454)</td>
</tr>
</tbody>
</table>
## RQ Examples

<table>
<thead>
<tr>
<th>Hazardous substance</th>
<th>Reportable quantity (RQ) - pounds (kilograms)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic&lt;sup&gt;+&lt;/sup&gt;</td>
<td>1 (0.454)</td>
</tr>
<tr>
<td>Lead&lt;sup&gt;+&lt;/sup&gt;</td>
<td>10 (4.54)</td>
</tr>
<tr>
<td>Tetrachloroethylene</td>
<td>100 (45.4)</td>
</tr>
<tr>
<td>Xylene</td>
<td>100 (45.4)</td>
</tr>
<tr>
<td>Toluene</td>
<td>1000 (454)</td>
</tr>
<tr>
<td>2-Butanone</td>
<td>5000 (2270)</td>
</tr>
<tr>
<td>Methyl ethyl ketone</td>
<td>5000 (2270)</td>
</tr>
</tbody>
</table>

<sup>+</sup> The RQ for these hazardous substances is limited to those pieces of the metal having a diameter smaller than 100 micrometers (0.004 inches).
**Is there a Reportable Quantity?**

- PCBs: \( \text{RQ} = 1 \text{ Lb.} \)
- What is my shipment Net Weight?
- The RQ is per shipping container (Drum, CYB, DT, etc.)
- If Dump Trailer maybe 22 tons = 44,000 Lbs.
- \( \text{RQ} / \text{Net Weight of container} \)
- 1 Lb. / 44,000 Lbs. = 0.0000227
- \( 1,000,000 \times 0.0000227 = 22.7 \text{ ppm} \)
- \(< 50 \text{ ppm PCB soil needs a Proper Shipping Name?} \)
Is there a Reportable Quantity?

- If Load is 32 Tons = 64,000 Lbs.
- 1 Lb. / 64,000 Lbs. = 0.0000156
- 1,000,000 ppm x 0.0000156 = 15.6 ppm
- RQ for Lead if D008 is 10 Lbs.
- RQ for Arsenic is 1 Lb. (particle size restriction)
- RQ for Perchloroethylene is 100 Lbs.
- If F002 then 10 Lbs.
Hazardous Material?

- Proper Shipping Name
- Bill of Lading could be okay
- Check the HM box
- Driver needs HazMat Endorsement
- Is a placard required?
- Who is responsible to provide the required placard?
- Shipper (signer of paperwork)
  - HazMat Registered?
  - DOT trained?
Summary

- Manifest signature is a certification!
- Not HMR registered and / or DOT trained – Don’t sign!
- Proper shipping names for the not so obvious wastes
- RQ’s – Do the calculations
- E-Manifests – Not going away & Not optional
- Check with your state on myRCRAid
- Not every state has adopted myRCRAid
Questions?

Thank You!

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(315) 406-9342
steve.cross@heritage-enviro.com
US DOT’s Hazardous Materials Registration Requirements, US DOT’s Role in Incident Investigation, Training Programs Available

Peg Carlson

Investigator, Pipeline and Hazardous Materials Safety Administration

U.S. Department of Transportation, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Office of Hazardous Materials Enforcement

Peg Carson
Investigator, Eastern Region
Jurisdictions

FAA   USCG  FRA   FMCA   PHMSA

air     water    rail    highway    all modes
Eastern Region

- Maine
- New Hampshire
- Vermont
- Massachusetts
- Connecticut
- Rhode Island
- New York
- New Jersey
- Pennsylvania
- Delaware
- Maryland
- D.C.
- Virginia
- West Virginia
- Western Region
HMR

- Hazardous material means a substance or material that the Secretary of Transportation has determined is capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and has designated as hazardous under Section 5103 of Federal hazardous materials transportation law (49 U.S.C. 5103). The term includes hazardous substances, hazardous wastes, marine pollutants, elevated temperature materials, materials designated as hazardous in the Hazardous Materials Table (see 49 CFR 172.101), and materials that meet the defining criteria for hazard classes and divisions in Part 173 of Subchapter C of this chapter.

- Hazardous Materials Regulations or HMR means the regulations at 49 CFR Parts 171 through 180.
Commerce

Trade or transportation in the jurisdiction of the United States within a single state; between a place in a state and a place outside the state; or that affects trade or transportation between a place in a state and a place outside of the state.
Types of Inspections

Specialized Activities

Container Manufacturers:
Steel, poly, fiber drums; Jerricans; Cylinders; Wooden, fiberboard boxes; IBC’s ("totes")

LOGSA oversight. Tobyhanna, PA
Tobyhanna Army Depot is the largest, full-service electronics maintenance facility in the Department of Defense (DoD). The depot’s mission is total sustainment, including design, manufacture, repair and overhaul of hundreds of electronic systems. They include satellite terminals, radio and radar systems, telephones, electro-optics, night vision and anti-intrusion devices, airborne surveillance equipment, navigational instruments, electronic warfare, and guidance and control systems for tactical missiles. Tobyhanna is DoD’s recognized leader in the areas of automated test equipment, systems integration and downsizing of electronics systems. The Army has designated Tobyhanna as its Center of Industrial and Technical Excellence for communications- electronics, radar, and missile guidance and control. The Air Force has designated Tobyhanna as its Technical Source of Repair for command, control, communications and intelligence systems.
Specialized Activities (continued)

- Drum reconditioners, rebuilders
- Cylinder retesters, repair, rebuilders
- Radioactive Materials
- Explosives manufacturers, shippers
- Freight terminals
- Aerosol fillers/shippers
- Medical Waste
- Lithium cell & battery manufacturers
- Port Inspections, MASFO’s
Specialized Activity (continued)

Third party Inspectors and labs

Cylinders Package testers
Package testing

- Drop Test – §178.603
  - All packagings
- Leakproofness Test – §178.604
  - All packagings intended for liquids
- Hydrostatic Test – §178.605
  - Metal, plastic and composite intended for liquids
- Stacking Test – §178.606
  - All packaging other than bags
- Vibration Standard – §178.608
  - All packaging
INSPECTIONS

- Hazardous Materials
- Package
- Papers
- Safety, Security
- Training
• Hazardous Materials Table
  49 CFR 172.101

• Proper shipping name, Hazard class, ID Number, packing group, label codes, Special Provisions, Limited Quantities, Exceptions
Hazardous Materials Inspection

Intro, purpose of inspection,
Corporate structure, description of process, number of facilities, number of employees.

What are the regulated materials?

Who do you buy from? Sell to? Imports?
  Info on exporter
  Air or sea
Points of entry
  Freight forwarders
Shipping papers
• Internet sales?
• Drop shipping?
• Methods of Shipments
  – Company vehicles, common carriers, DHL, FedEx, UPS, USPS, other
  – Quantities subject to placarding carried on company vehicles?
  – Registered with DOT?
  – Written Security Plan?
  – Hazardous materials training?
The Package

- Codes - year of manufacture, Country of Origin, weight limits, specific gravity, UN package testing
- Packaging
- Marking
- Labeling
- Closure Instructions
- Packaging exceptions, LQ, CC
- Exemptions or Special Permits
Z – PGIII
(minor danger)

Y – PGII
(medium danger)

X – PGI
(great danger)
The Package
Is this package intended to contain liquids?  yes
Hazardous Substances and Marine Pollutants
- Prohibited marking – §172-303
- Limited Quantities – §172.301
- Special Permits/Exemption – §172.301(c)
  - DOT-SP
  - DOT-E
- Authorized abbreviations – §172.308
- Class 7 (radioactive) – §172.310
- Liquid hazardous materials – §172.312
  - Combination packagings
- ORM-D – §173.316
- Explosives – §172.320
- Infectious Substance – §172.323
ORM-D and Consumer Commodity

Think hardware store
Package Manufacturers
Closure Instructions

4GV Packing Requirements

Inner packagings of any type for solids or liquids may be used with this combination package box provided the following conditions are met:

ANY DEVIATION WILL RENDER THE CERTIFICATION VOID

• The gross mass of the finished package must not exceed the gross mass indicated in the packaging specification markings on the outside of the box.
• 3" Polypropylene tape must be used to seal the top and bottom center seam of the package.
• The plastic liner must be used.
• For air shipments inner packaging containing liquid must comply with internal pressure test criteria (paragraph 5.0.2.9. & 6.3.5.4. of IATA Dangerous Goods Regulations).

Inner packaging must be completely surrounded with a sufficient quantity of vermiculite to absorb the entire liquid contents of the inner packagings. When inner packagings used are fewer or smaller than the originally tested packagings then sufficient additional cushioning material must be used to take up any void space. Please refer to the Certification Report for this package.
Shipper is responsible

CLOSE THIS FLAP FIRST

It is shipper's responsibility to ensure products being shipped are entirely compatible with this combination package and are packaged per the appropriate authority's regulations.

DG Supplies Inc. shall not be liable or responsible for any loss or damage, whether direct or indirect, resulting from the sale, use, or misuse of DG Supplies Inc. supplied packagings. The shipper of dangerous goods must determine the suitability of packaging for use with its contents.
Inner packaging observed  Inner packaging available (not used)
Allowable gap usually ¼”

Nut missing

Unauthorized container

09/26/2007
Facility tour, continued

- Reconditioned drums used?
  - Cleaned to base metal? Labels removed? Tested? Properly rated?
  - Check bottom

- Is your company filling drums?
- Correct tools to close drums present, and used? Torque wrenches
- Copy of closing instructions

- Ask for package to be opened on loading dock

* Evidence of transportation in commerce
  - Invoices, Shipping documents from shipping department
  - Measurements
  - PHOTOGRAPHS
  - Written Observation Reports.
| Document review | Exit briefing with Probable Violations (if any) |
| Security Plan - post 9-11 |  |
| Employee Training Records |  |
| Document requests resulting from tour |  |
| Material Safety Data Sheet (MSDS) requests |  |
| Special Permits |  |
|  | Corrective Action within 30 days |
|  | Result: no further action, warning, ticket, or case |
Undeclared Hazardous Materials

- No shipping documents
- No HM marking or labeling
- Non specification container
- Carriers surcharge \(~$20.00\) per haz mat package due to the special handling
- \$$\text{High financial incentive, High Hazard}\$
- eBay, mom and pop businesses, reshippers
As the result of one inspection, violations may be found against multiple entities, based on containers observed in the warehouse, and the review of shipping documents.
Upon determination that a probable violation exists, the Associate Administrator for Hazardous Materials Safety is authorized to impose certain sanctions, including warning letters, tickets, compliance orders, and civil penalties. In addition, legal action, including injunctive or criminal proceedings, may be initiated. Title 49 U.S.C. Sections 5123 and 5124 provide for civil and criminal penalties for violation of the Hazardous Materials Regulations.

A civil penalty of not more than $78,376, but not less than $471 when related to training, per violation may be imposed through administrative proceedings initiated by the Office of Chief Counsel of the Pipeline and Hazardous Materials Safety Administration. In addition, if a violation results in death, serious illness, or severe injury to any person or substantial destruction of property, the agency may increase the amount of the civil penalty for each violation to not more than $182,877. When a criminal violation has been determined by a court, a fine of up to $250,000 for an individual and up to $500,000 for a company, imprisonment for not more than 5 years, or both, may be imposed for each violation. The maximum amount of imprisonment shall be 10 years in any case in which the violation involves the release of a hazardous material that results in death or bodily injury to any person.
Appendix A to Subpart D of Part 107 — Guidelines for Civil Penalties

I. This appendix sets forth the guidelines PHMSA uses (as of October 2, 2013) in making initial baseline determinations for civil penalties. The first part of these guidelines is a list of baseline amounts or ranges for frequently-cited probable violations. Following the list of violations are general guidelines PHMSA uses in making penalty determinations in enforcement cases. [Appendix A I.]

II. List of Frequently Cited Violations [Appendix A II.]

<table>
<thead>
<tr>
<th>Violation description</th>
<th>Section or cite</th>
<th>Baseline assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Requirements</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Registration Requirements: Failure to register as an offeror or carrier of hazardous material and pay registration fee:</td>
<td>107.608, 107.612.</td>
<td></td>
</tr>
<tr>
<td>1. Small business or not-for-profit</td>
<td></td>
<td>$1,200 + $600 each additional year.</td>
</tr>
<tr>
<td>2. All others</td>
<td></td>
<td>$3,500 + $1,000 each additional year.</td>
</tr>
<tr>
<td>B. Training Requirements:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Failure to provide initial training to hazmat employees (general awareness, function-specific, safety, and security awareness training):</td>
<td>172.702.</td>
<td>$1,500 for each area.</td>
</tr>
<tr>
<td>a. More than 10 hazmat employees</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. 10 hazmat employees or fewer</td>
<td></td>
<td>$1,000 for each area.</td>
</tr>
</tbody>
</table>
Http://hazmat.dot.gov

Hazardous Materials INFO-LINE
1-800-HMR49-22

Answers to HMR questions
Request copies of Federal Register, exemptions or training materials
Report HMR violations
Fax on Demand
Boston PD Commercial Vehicle Enforcement Unit – Transportation Inspections & Incidents – City of Boston Restrictions

Eumir Pena

Police Officer

Commercial Vehicle Enforcement Unit

Boston Police Department
Non-Hazardous Shipping Documents

Max Forsythe

Business Development Manager
National Response Corporation (NRC)
Non-Hazardous Shipping Documentation

Max Forsythe
Business Development Manager
Non-Hazardous Waste Manifest

<table>
<thead>
<tr>
<th>Non-Hazardous Waste Manifest</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Non-Hazardous Waste</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
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<tbody>
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</table>

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<tr>
<th>Column 5</th>
<th>Column 6</th>
<th>Column 7</th>
<th>Column 8</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

NRC
Non-Hazardous Waste Manifest

- When and why is it used?
- Summary of document
- Key items to review prior to signature
Massachusetts Bill of Lading

| Massachusetts Department of Environmental Protection |
| Bureau of Waste Site Cleanup |
| BILL OF LADING (pursuant to 310 CMR 40.0000) |

### A. LOCATION OF SITE OR DISPOSAL SITE WHERE REMEDIATION WASTE WAS GENERATED:
1. Release Name/Location Act: __________
2. Street Address: __________
3. City/Town: __________
4. Zip Code: __________
   - Check here if the disposal site that is the source of the release is Tier Classified. Check the correct Tier Classification Category:
     - Tier I
     - Tier II
     - Tier III
     - Tier IV

### B. THIS FORM IS BEING USED TO: (check one: B1-B4)
1. Submit a Bill of Lading (BOL) to transport Remediation Waste to Temporary Storage or a Receiving Facility. Response Actions associated with the BDL (check all that apply):
   - Immediate Response Action (IRA)
   - Comprehensive Response Actions
   - Release Assessment Measure (RAM)
   - Limited Removal Action (LRA) (must be submitted pursuant to 310 CMR 40.0000)
   - Decontaminate Property Status (DPS)
   - Utility Release Abatement Measure (URAM)
   - Other: __________

2. Submit an Attestation of Completion of Shipment to Temporary Storage (Sections C, F and J are not required):
3. Submit an Attestation of Completion of Shipment to a Receiving Facility (Sections C, F and J are not required):
4. certify that Remediation Waste Was Not Shipped, and the Bill of Lading is Voided. (Sections C, D, G, and F are not required):
   - Date Bill of Lading submitted to the Department: __________
   - E4P Transaction ID: __________
5. Period of Generation Associated with this Bill of Lading: __________
   - E4P ID: __________
   - E4P ID: __________
   - (All sections of this transmission form must be filled out unless otherwise noted)

The Bill of Lading is not considered complete until the Attestation of Completion of Shipment is received by the Department.

### C. DESCRIPTION OF WASTE AND WASTE SOURCE:
1. Contaminated Media (check all that apply):
   - a. Soil
   - b. Sediment
   - c. Surface Water
   - d. Vegetation or Organic Detritus
   - e. Decontamination Waste

2. Uncontaminated Waste (check all that apply):
   - a. Inorganic Absorbent Materials
   - b. Other: __________
Massachusetts Bill of Lading

- When and why is it used?
- Summary of document
- Key items to review prior to signature
- The initial Bill of Lading, which includes the LSP Opinion and Remediation Waste Characterization, must be submitted electronically through eDEP.
- Follow-up documentation, includes:
  - BWSC112A Summary of Shipment Sheet
  - BWSC112B Summary Sheet Signature Page
  - Transport Log Sheet
Massachusetts Material Shipping Record

- When and why is it used?
- Comparison to BOL
- Key items to review prior to signature
QUESTIONS & ANSWERS

QUESTIONS?

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