

# U. S. Department of Energy



## Consolidated Audit Program Treatment, Storage and Disposal Facilities

### Checklist 7 Transportation Management

Revision 1.2  
November 30, 2007

Audit ID:

Date:

Audit ID: \_\_\_\_\_ TSDF: \_\_\_\_\_ Auditor: \_\_\_\_\_

Prepared by: Todd Hardt

Approved by: *Carolynne Thomas*

## Areas of Review During Audit

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Transportation Management         | <input type="checkbox"/> Tanks                          | <input type="checkbox"/> Placarding         |
| <input type="checkbox"/> Identification and Classification | <input type="checkbox"/> Documentation                  | <input type="checkbox"/> Emergency Response |
| <input type="checkbox"/> Packaging                         | <input type="checkbox"/> Container Labeling and Marking | <input type="checkbox"/> Training           |

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NA = Not Applicable

F = Finding

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### Referenced regulations are accessible at the following URLs:

- <https://doecap.oro.doe.gov>
- <http://www.access.gpo.gov/nara/cfr/cfr-table-search.htm#page1>

### NOTE:

- When audit findings are written against *site-specific documents* (i.e., SOPs, QA Plans, licenses, permits, etc.), a *copy* of the *pertinent requirement text* from that document *must* be attached to this checklist for retention in DOECAP files.

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Item Number	Lines of Inquiry	Status	Response/Comment
<b>1.0</b>	<b>Transportation Management</b>		
1.1	<i>Basic Questions About the Material</i>		
1.1.1	Do materials (including samples) shipped from the facility as hazardous materials meet the definition in 49 CFR 171.8? <i>49 CFR 171.8</i>		
1.1.2	Do materials to be shipped as Hazardous Wastes, meet the definitions in <i>40 CFR 261</i> ?  (a) Listed – F,K,U, or P? (b) Characteristic – TCLP, Ignitable, Corrosive, or Reactive? <i>40 CFR 261</i>		
1.1.3	Are materials, IN ONE PACKAGE, equal to or exceeding the reportable (RQ) listed in <i>Appendix A of 49 CFR 172.101</i> ? <i>49 CFR 172.101, Appendix A</i>		
1.1.4	Are any materials being shipped as Marine Pollutants as listed in <i>Appendix B of 49 CFR 172.101</i> ? <i>Appendix B of 49 CFR 172.101, 171.4 and 171.8</i>		
1.1.5	Are materials being shipped as Elevated Temperature Materials? <i>49 CFR 171.8</i>		

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1.1.6	Does facility report outbound shipments of waste through an automated transportation management system? <i>DOE Order 460.2A</i>		
1.1.7	Are any shipments made by or on behalf of FACILITY done under an on-site transportation plan? <i>NQA-1</i>		
1.1.8	By what process are notifications of shipments made?		
1.1.9	Are copies of applicable transportation and packaging regulations up to date and available for consult and use?		
1.1.10	Are all carriers used by the plant registered with DOT and been approved by DOE under the MCEAP process? <i>49 CFR 107.608</i>		
1.2	<b><i>Basic Questions About the Facility</i></b>		
1.2.1	Does the facility receive, and have employees involved in, the unloading of hazardous materials?  <ul style="list-style-type: none"> <li>• What hazardous materials are received (including raw materials and waste streams)?</li> <li>• Are the employees trained to perform their function?</li> </ul> <i>49 CFR 177.816</i>		

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1.2.2	Does the facility ship hazardous materials, and have employees, (or contract agents) involved in the preparation (includes loading and handling) of those hazardous materials for transport? (Note: Shippers can become carriers by assuming the duties of a carrier, like loading the cargo, etc.)  <i>49 CFR 177.816</i>		
1.2.3	Who is the Hazardous Material Transportation Coordinator for the facility?  <i>NQA-1</i>		
1.2.4	Is the Hazardous Material Transportation Coordinator designated in writing?		
1.2.5	Is the facility (or company) registered to offer or transport hazardous materials?  <i>49 CFR 107.601</i>		
1.2.6	Are there sufficient written procedures to describe the range of operations and specific loading and/or unloading and packaging and handling processes?  <i>49 CFR 177.834</i>		
1.2.7	Does the facility test, recondition, repair, modify, mark, or otherwise represent containers, drums, or packages as qualified for use in the transportation of hazardous materials?  <i>49 CFR 173.28</i>		

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1.2.8	The facility has a documented and implemented transportation security plan? <i>49 CFR 172. Subpart 1 – Security Plans</i>		
1.3	<i>Previously Documented Material</i>		
1.3.1	Is the material reliably identified as a pure or technical grade material that is listed by Proper Shipping Name in the Hazardous Materials Table? <i>49 CFR 172.101</i>		
1.3.2	If the answer to (1) is YES, are the Proper Shipping Name, Hazard Classification, and Packing Group used exactly as shown in the Hazardous Materials Table? <i>49 CFR 172.101</i>		

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<b>2.0</b>	<b>Identification and Classification of Hazardous Materials and Waste</b>		
2.1	<i>Identification of Hazardous Material</i>		
2.1.1	Is any material a waste which requires an EPA Hazardous Waste Manifest? <i>49 CFR 172.205a</i>		
2.1.2	Are any materials listed as a potential Hazardous Substance as defined in <i>49 CFR 172.101 Appendix A</i> ? <i>49 CFR 172.10,1 Appendix A</i>		
2.1.3	Are any materials Elevated Temperature Material as defined at <i>49 CFR 171.8</i> ? <i>49 CFR 171.8</i>		
2.1.4	Is any material a Marine Pollutant as listed in <i>49 CFR 172.101 Appendix B</i> ? <i>49 CFR 172.101, Appendix B: 49 CFR 171.4 and 171.8</i>		
2.2	<i>Classification of Hazardous Material</i>		
2.2.1	If the material meets more than one hazard classification definition, is it classified in accordance with <i>49 CFR 173.2a</i> ? <i>49 CFR 173.2a</i>		

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2.3	<b><i>Classification of Outgoing Hazardous Materials</i></b>		
2.3.1	The facility has a process in place to properly characterize materials that have more than one hazard classification definition. If meeting more than one classification, subsidiary hazards are recognized?  <i>49 CFR 173.2a</i>		
2.4	<b><i>Identification of RCRA Wastes</i></b>		
2.4.1	If a waste material, has the determination been made whether the material meets the <i>40 CFR 261</i> definition of a "Hazardous Waste?"  <i>40 CFR 261</i>		
2.4.2	If the material is a <i>40 CFR 261</i> hazardous waste, is the shipment subject to the Hazardous Waste manifesting requirements of <i>40 CFR 262.20</i> ? Are radioactive wastes described and listed on the appropriate NRC low-level waste manifest form?  <i>40 CFR 262.20; NRC-540/NRC-541</i>		
2.5	<b><i>Proper Shipping Name Selection</i></b>		
2.5.1	Is the Proper Shipping Name assigned to the material as stated in the Hazardous Materials Table?  <i>49 CFR 172.101</i>		
2.5.2	Is the Proper Shipping Name selected appropriate for the actual characteristics of the material, including classification, packing group, and subsidiary hazard(s)?  <i>49 CFR 172.101</i>		

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2.5.3	Is the Proper Shipping Name selected the most specific appropriate PSN listed?  <i>49 CFR 172.101 HMT</i>		
2.5.4	If the material is known to be a Material Poisonous by Inhalation, is Special Provision "1", "2", "3", or "4" indicated for the PSN in Column 7 of the Table?  <i>49 CFR 172.101 HMT</i>		
2.5.5	If the material is a mixture of a material listed in the Table by technical name and non-hazardous material, does the mixture have the same characteristics as the pure technical material?  <i>49 CFR 172.101 HMT</i>		
2.5.6	If the material requires a Hazardous Waste Manifest under EPA regulations at 40 CFR 262, is the Proper Shipping Name preceded with "Waste?"  <i>49 CFR 172.101 (c)(9)</i>		

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<b>3.0</b>	<b>Packaging</b>		
3.1	<i>Specification Packaging</i>		
3.1.1	Does the facility utilize UN specification packaging? <i>49 CFR 172.101 HMT Column 8B&amp;C</i>		
3.1.2	Is the packaging type allowed for the hazardous material in the package? <i>49 CFR 172.101 HMT Column 8B&amp;C</i>		
3.1.3	Is the packaging certified as acceptable for the packing group of the hazardous material in the package? <i>49 CFR 172.101 HMT Column 8B&amp;C</i>		
3.1.4	If the package contains either solid material or inner packaging, is its weight within the maximum gross mass specified for the packaging? <i>49 CFR 173.24</i>		
3.2	<i>Non-Specification Packaging</i>		
3.2.1	Is the hazardous material eligible for shipment in non-specification packaging (i.e. exception or exemption)? <i>49 CFR 172.101 HMT Column 8A</i>		

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3.2.2	If the package contains a hazardous material being shipped as a small quantity, does the packaging satisfy requirements of 49 CFR 173.4?  <i>49 CFR 173.4</i>		
3.3	<b><i>Specification Packaging Testing/Certification</i></b>		
3.3.1	Is the certificate of conformance /UN test summary for packaging on file?  <i>49 CFR 178.3 (c)</i>		
3.4	<b><i>Package Size Limitations</i></b>		
3.4.1	If an air shipment, is the net weight of each package within the limit specified for the material in Column 9A or 9B of the Hazardous Materials Table in 49 CFR 172.101?  <i>49 CFR 172.101</i>		
3.4.2	If an air shipment includes a package which exceeds the net weight allowed on board a passenger aircraft, is the shipping paper noted and the package labeled "CARGO AIRCRAFT ONLY?"  <i>49 CFR 172.101 HMT Column 9B</i>		
3.4.3	If a package is shipped as a limited quantity, is its gross weight no more than 30kg (66 lbs.)?  <i>49 CFR 173.150(b), 173.151(b), 173.152(b), 173.153(b), 173.154(b), 173.155(b), and 173.306(a)</i>		

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3.5	<i>Separation and Segregation Requirements</i>		
3.5.1	Are controls in place to ensure that the carrier and/or shipper are aware of applicable separation or segregation requirements, and that loading is in compliance with those requirements?  <i>49 CFR 177.848</i>		

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4.0	<b>Tanks</b>		
4.1	<i>Portable Tanks (more than 119 gallons)</i>		
4.1.1	Is the proper shipping name marked on 2 opposing sides? <i>49 CFR 172.326</i>		
4.1.2	Is the owner marked on the portable tank? <i>49 CFR 172.326</i>		
4.1.3	Is the ID number on the tank (less than 1,000 gals – 2 opposing sides, 1,000 gals or more each side and each end)? <i>49 CFR 172.302</i>		
4.1.4	If transported under a special permit, is the DOE-SP number on the tank? <i>49 CFR 172.302 (c)</i>		
4.1.5	Is the tank labeled unless placarded in accordance with 49 CFR 172.514? <i>49 CFR 172.400</i>		
4.1.6	If transported by highway, is the load segregated and separated? <i>49 CFR 177.848</i>		
4.1.7	Is the load properly blocked and braced? <i>49 CFR 177.834, 174.63</i>		

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4.1.8	Is the tank DOT, IM or UN specification, and does it have a Spec plate? <i>49 CFR 172.101, 178.273 (b)(7), 178.274 (i)</i>		
4.1.9	Have the proper placards with ID numbers been tendered or affixed? <i>49 CFR 172.514</i>		
4.1.10	If the product has a subsidiary hazard, have the appropriate placards been tendered? <i>49 CFR 172.505</i>		
4.1.11	Does the driver have the shipping documents? <i>49 CFR 177.817</i>		
4.2	<b><i>Cargo Tanks</i></b>		
4.2.1	Is the cargo tank the proper type? <i>49 CFR 172.101</i>		
4.2.2	Does the cargo tank have a Spec plate? <i>49 CFR 178.3, 178.337-17, 178.338-18, 178.345-14</i>		
4.2.3	Is the cargo tank marked with the proper tests and dates? <i>49 CFR 180.407, 180.415</i>		
4.2.4	Is a qualified person attending the cargo tank? <i>49 CFR 177.834</i>		

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4.2.5	Have the safety precautions been met? <i>49 CFR 177.834</i>		
4.2.6	Are all manhole covers and outlets closed? <i>49 CFR 178.337-6, 178.337-8, 178.345-5, 178.345-11</i>		
4.2.7	If the product has a subsidiary hazard, have the appropriate placards been tendered or affixed? <i>49 CFR 172.505</i>		
4.2.8	Have the proper placards with ID numbers been tendered or affixed? <i>49 CFR 172.514</i>		
4.2.9	If the product is a Marine Pollutant, has the proper marking been applied? <i>49 CFR 172.322(b)</i>		
4.2.10	Does the driver have shipping documents? <i>49 CFR 177.817</i>		
4.3	<b><i>Tank Cars (loading and unloading)</i></b>		
4.3.1	If the tank car is empty, is "Residue: Last Contained****" on the shipping document? <i>49 CFR 172.203(e)(2)</i>		

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4.3.2	Does the tank car leak? <i>49 CFR 174.50</i>		
4.3.3	Is the tank car marked and placarded? <i>49 CFR 174.59</i>		
4.3.4	Are knowledgeable and reliable persons performing the unloading? <i>49 CFR 174.67</i>		
4.3.5	Are the brakes set and the wheels blocked on the tank car? <i>49 CFR 174.67</i>		
4.3.6	Are the caution signs in place? <i>49 CFR 174.67 (a)(4)</i>		
4.3.7	Has the pressure been relieved or the tank car cooled? <i>49 CFR 174.67 (b)</i>		
4.3.8	Has the manhole cover been removed properly? <i>49 CFR 174.67 (b)</i>		
4.3.9	Is the manhole cover adjusted properly for bottom outlet valve unloading? <i>49CFR174.67 (c) (1)(2)(3)</i>		

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4.3.10	Has the valve handle rod or control been operated several times to seat? <i>49 CFR 174.67 (f)</i>		
4.3.11	If needed, is the valve reducer tight? <i>49 CFR 174.67 (g)</i>		
4.3.12	Are unloading connections securely attached? <i>49 CFR 174.67 (h)</i>		
4.3.13	Is the unloading process attended? <i>49 CFR 174.67 (i)</i>		
4.3.14	After unloading, are all the valves closed and made tight and the hoses disconnected? <i>49 CFR 174.67 (l)</i>		
4.3.15	Is the manhole cover closed and made tight?		
4.3.16	Is all spillage attended to?		

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<b>5.0</b>	<b>Documentation</b>		
5.1	<i>Shipping Papers</i>		
5.1.1	Has the shipper prepared shipping papers for each hazardous material shipment? <i>49 CFR 172.200(a)</i>		
5.1.2	Are all portions of hazardous materials description printed in English? <i>49 CFR 172.201(a)(2)</i>		
5.1.3	If the shipping paper describes both hazardous and non-hazardous materials, are the hazardous materials listed first or otherwise differentiated? <i>49 CFR 172.201(a)(1)(i)</i>		
5.1.4	Is the basic description (identification number, proper shipping name, hazard classification, and packing group) shown in the proper order without extraneous information? <i>49 CFR 172.202(a)(1)(2)(3)(4)</i>		
5.1.5	Is the total quantity of hazardous material appropriately shown? <i>49 CFR 172.202(a)(5)</i>		
5.1.6	If required, is the technical name of the hazardous material appropriately shown in parentheses? <i>49 CFR 172.202(a)(5)(d)</i>		

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5.1.7	If an special permit applies to the shipment, is the special permit number shown as required? <i>49 CFR 172.203(a)</i>		
5.1.8	If the shipping paper describes a hazardous material moving as a limited quantity, does the description include the notation "Limited Quantity" or "Ltd Qty"? <i>49 CFR 172.203(b)</i>		
5.1.9	If the shipping paper describes a hazardous material which meets the DOT definition of a Hazardous Substance, is the notation "RQ" appropriately shown? <i>49 CFR 172.203(c)</i>		
5.1.10	If the shipping paper describes a "material poisonous by inhalation," are the notations "Poison-Inhalation Hazard" and the applicable Hazard Zone appropriately shown? <i>49 CFR 172.203(m)</i>		
5.1.11	If the shipping paper describes a material which has a subsidiary hazard of Division 6.1 Packing Group I or II, is the notation "Poison" appropriately shown? <i>49 CFR 172.203(m)</i>		

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5.1.12	<p>If the shipping paper describes a Class 7 (radioactive) material, is the additional information required by 49 CFR 172.203(d) included?</p> <ul style="list-style-type: none"> <li>• Radionuclides? (1)</li> <li>• Description of physical and chemical form (2)</li> <li>• Activity in s.i. units? (3)</li> <li>• Label-type required? (4)</li> <li>• Transport Index (5)</li> <li>• Fissile Excepted, if required (6)</li> <li>• Package identification? (7)</li> </ul> <p><i>49 CFR 172.203(d)</i></p>		
5.1.13	<p>If the material described is a Hazardous Waste, is the shipping paper on the prescribed Hazardous Waste or Uniform Low-Level Waste Manifest form?</p> <p><i>49 CFR 205(a)</i></p>		
5.1.14	<p>Is the appropriate certification language included?</p> <p><i>49 CFR 172.205(a)</i></p>		
5.1.15	<p>If previously used empty packaging contains only the residue of a hazardous material, does the shipping paper conform to 49 CFR 172.203(e)?</p> <p><i>49 CFR 172.203(e)</i></p>		

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5.1.16	For air shipments, is the Shipper's Declaration in the required IATA format?  <i>IATA 8.1.1</i>		
5.1.17	For air shipments, is the Declaration signed by the appropriate U.C.C. representative (not the cartage agent or carrier representative)?  <i>IATA 8.1.6.15</i>		
5.1.18	Does the carrier have the shipping documents?  <i>49 CFR 175.33</i>		
5.1.19	If an empty package containing only the residue of a hazardous material is used, is it transported in the same manner as when it previously contained a greater quantity of that hazardous material?  <i>49 CFR 173.29(a)</i>		
5.1.20	If an empty package is not shipped in the same manner as before: <ul style="list-style-type: none"> <li>• Have all markings, labels, and placards been removed?</li> <li>• Is it new, cleaned of residue and purged, refilled with a non-hazardous material or contain only residue of an ORM-D material or a non-flammable gas?</li> <li>• Any material contained in the packaging does not meet the 49 CFR 171.8 definition of a hazardous substance, hazardous waste, or a marine pollutant?</li> </ul> <i>49 CFR 173.29(b)(1); 49 CFR 173.29(b)(2)(i), (ii), (iii), (iv) [A][B]; 49 CFR 173.29(3)</i>		

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5.1.21	Are all key shipping papers kept on file for at least two years? <i>49 CFR 172.201(4)(c)</i>		
5.2	<b><i>Outgoing Hazardous Waste Manifesting Requirements</i></b>		
5.2.1	Review select outgoing manifests for periods covering the last year to determine if: <ul style="list-style-type: none"> <li>- Proper Shipping Names (PSN) is selected appropriate for the actual characteristics of the material, including classification, packing group and subsidiary hazards.</li> <li>- If material is known to be a Material Poisonous by Inhalation, Special Provision 1,2,3 or 4 indicated in the PSN.</li> <li>- The word "Waste" is used for materials that require a Hazardous Waste Manifest.</li> </ul> <i>49 CFR 172.202(a); 49 CFR 172.203(m); 49 CFR 172.101(c)(9)</i>		
5.2.2	If a Hazardous Waste manifest is required, is the source of the form approved by the EPA? <i>40 CFR 262.21(g)</i>		
5.2.3	Is the manifest completed properly, including the EPA identification numbers for the generator, transporter, and designated facility, as required by 40 CFR 262.20(a)? <i>40 CFR 262.20(a)</i>		

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5.2.4	If the hazardous waste identified correctly on the manifest in accordance with both EPA rules (40 CFR 262 Subpart B) and the DOT Hazardous Materials Regulations (49 CFR 172.200)?  <i>40 CFR 262 Subpart B; 49 CFR 172.200</i>		
5.2.5	Is the manifest signed by the generator, transporter, and the designated facility?  <i>49 CFR 172.205(c)(1)(2)(d)(2)</i>		
5.2.6	Are copies of the signed manifest maintained for at least three years?  <i>49 CFR 172.205(5)</i>		
5.2.7	Is the facility in compliance with the exception reporting requirements of 40 CFR 262.42 in unreturned manifests?  <i>40 CFR 262.42</i>		
5.3	<b><i>Inbound Hazardous Waste Manifesting Requirements</i></b>		
5.3.1	All RCRA regulated waste is received on a Uniform Hazardous Waste Manifest.  <i>40 CFR 264.71</i>		
5.3.2	Manifest discrepancies are documented and resolved with the generator within 15 days of receipt.  <i>40 CFR 264.72(c)</i>		

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5.3.3	Copies of manifests are retained at the facility for at least 3 years from the date of delivery. <i>40 CFR 264.71(b)(5)</i>		

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Approved by: *Carolynne Thomas*

Item Number	Lines of Inquiry	Status	Response/Comment
<b>6.0</b>	<b>Container Labeling and Marking</b>		
6.1	<i>Marking of Non-Bulk Packages</i>		
6.1.1	Are all required markings durable, legible and placed in a location and of such a size that it is readily visible? <i>49 CFR 178.3(a) and 49 CFR 178.503(a)</i>		
6.1.2	Is the hazardous material's Proper Shipping Name marked as provided in the Hazardous Materials Table? Is the hazardous material's identification (with its UN or NA prefix) marked? <i>49 CFR 172.301(a)</i>		
6.1.3	If required, is the technical name of the hazardous material, in parentheses, appropriately marked? <i>49 CFR 172.301(b)</i>		
6.1.4	If the package is authorized under a special permit, is the special permit number marked as required? <i>49 CFR 172.301(c)</i>		
6.1.5	If the package contains hazardous material which meets the DOT definition of a Hazardous Substance, is it appropriately marked "RQ?" <i>49 CFR 172.324</i>		
6.1.6	If the package contains a "material poisonous by inhalation," is it appropriately marked "Inhalation Hazard?" <i>49 CFR 172.313(a)</i>		

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Item Number	Lines of Inquiry	Status	Response/Comment
6.1.7	If the package bears RADIOACTIVE labels, is the required information marked on both of the required labels in s.i. units? <i>49 CFR 172.403(g)(2)</i>		
6.1.8	If a package of radioactive material with a gross weight over 50 kg (110 lbs.), is its gross weight plainly and durably marked?" <i>49 CFR 172.310(a)</i>		
6.1.9	If a Type A or Type B radioactive material package, is all required package identification information marked? <i>49 CFR 172.310(b)</i>		
6.1.10	If a liquid hazardous material is in a combination packaging, is the package marked on opposite sides with orientation? <i>49 CFR 172.312(a)(2)</i>		
6.1.11	If the package contains a Hazardous Waste, is it marked with the EPA notice? <i>40 CFR 262.32(b)</i>		
6.2	<b><i>Labeling of Non-Bulk Packages</i></b>		
6.2.1	Is the primary hazard label as provided in Column 6 of the Hazardous Materials Table? Are any subsidiary labels as provided in Column 6? <i>49 CFR 172.402(a)(1)(2)</i>		

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Item Number	Lines of Inquiry	Status	Response/Comment
6.2.2	Is the hazard class or division number properly displayed on both the primary and subsidiary hazard labels? <i>49 CFR 172.402 (b)</i>		
6.2.3	Are primary and subsidiary labels placed on the same side of the package as the Proper Shipping Name? <i>49 CFR 172.406(a)(ii)</i>		
6.2.4	Are subsidiary labels affixed within six inches of the primary label? <i>49 CFR 172.406(c)</i>		
6.2.5	Are radioactive materials packages labeled on two opposite sides? <i>49 CFR 172.403(f)</i>		
6.2.6	If the shipment is a limited quantity Division 6.1 material, is the POISON label affixed to each package? <i>49 CFR 172.402(e)(1)</i>		
6.2.7	If the shipment is a limited quantity hazardous material moving by air, is each package labeled as provided in Column 6 of the Hazardous Materials Table? <i>49 CFR 172.101</i>		
6.2.8	If required for an air shipment, is the CARGO AIRCRAFT ONLY label affixed? <i>49 CFR 172.402(c)</i>	6.2.8	If required for an air shipment, is the CARGO AIRCRAFT ONLY label affixed? <i>49 CFR 172.402(c)</i>

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Item Number	Lines of Inquiry	Status	Response/Comment
6.2.9	If previously used empty packaging contains a residue, is it labeled? <i>49 CFR 173.29(a)</i>	6.2.9	If previously used empty packaging contains a residue, is it labeled? 49 CFR 173.29(a)
6.3	<b><i>Marking of Bulk Packaging</i></b>		
6.3.1	Is the ID number marked on the package (less than 1,000 gals – 2 opposing sides, 1,000 gals or more each side and each end)? <i>49 CFR 172.302(a)</i>		
6.3.2	Does the marking meet the following minimum criterion? Rail cars – 0.24 inches wide by 3.9 inches high. Portable Tanks and IBCs with capacity less than 1,000 gallons – 0.16 inches wide by 1.0 inches high. Cargo Tanks and other bulk packages – 0.24 inches wide by 2.0 inches high. <i>49 CFR 172.302(b)</i>		
6.3.3	If the package is authorized under a special permit, is the special permit number marked as required? <i>49 CFR 172.301(c)</i>		
6.3.4	When empty, is each bulk package marked with the proper shipping name, common name, or identification number, unless it is cleaned and purged or refilled so that any residue remaining in the package is no longer hazardous? <i>49 CFR 172.302(d)</i>		

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6.3.5	If the package contains a "material poisonous by inhalation," is it appropriately marked "Inhalation Hazard?" <i>49 CFR 172.313(a)</i>		

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Item Number	Lines of Inquiry	Status	Response/Comment
<b>7.0</b>	<b>Placarding</b>		
7.1	<i>Placarding of Transport Vehicles</i>		
7.1.1	If placards are required and not already displayed, are placards provided to the driver? <i>49 CFR 172.506(a) and 40 CFR 262.33</i>		
7.1.2	If 49 CFR 172.504(e) Table 1 material is loaded, are specific placards displayed? <i>49 CFR 172.504(a)</i>		
7.1.3	If 1001 lbs. or more of Table 2 materials in non-bulk packaging are loaded, are specific or DANGEROUS placards displayed? <i>49 CFR 172.504(c)(1)</i>		
7.1.4	If the vehicle contains any Table 1 or Table 2 material in bulk packaging, are specific placards displayed? <i>49 CFR 172.504(a)</i>		
7.1.5	If required, are subsidiary placards displayed? <i>49 CFR 172.505(a)(b)(c)(d)</i>		
7.2	<i>Placarding of Bulk Packaging</i>		
7.2.1	If a portable tank is at least 3785 liters (1000 gallons) capacity, are all required placards affixed at front, rear, and sides of tank for all contents? <i>49 CFR 172.504(a)</i>		

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7.2.2	If a portable tank is less than 3785 liters (1000 gallons) capacity, are either labels or placards affixed for all contents?  <i>49 CFR 172.514(c)(1)</i>		
7.3	<b><i>Placarding of Freight Containers</i></b>		
7.3.1	If a freight container of at least 640 cubic feet capacity or more, or contains non-bulk packages with two or more categories of hazardous material, are specific or DANGEROUS placards displayed for all contents requiring placarding?  <i>49 CFR 172.512(a)</i>		
7.3.2	If a freight container has less than 640 cubic feet capacity, are either labels or placards displayed as required?  <i>49 CFR 172.504(c)(1), (2)</i>		

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Item Number	Lines of Inquiry	Status	Response/Comment
<b>8.0</b>	<b>Emergency Response</b>		
8.1	Is written emergency response information immediately available for all hazardous materials handled at loading and unloading sites? <i>49 CFR 172.600(a)</i>		
8.2	Is written emergency response information in the possession of the driver or crew for all hazardous material being transported, and in a location immediately accessible to facility personnel where hazardous material is being received, stored, or handled? <i>49 CFR 172.602(c)(1)</i>		
8.3	Is an emergency response telephone number shown immediately following the description of the hazardous material on the shipping paper or entered once on the shipping paper in a clearly visible location? <i>49 CFR 172.604(a)(3)</i>		
8.4	If the emergency response telephone number shown on the shipping paper applies to more than one hazardous material, is the number clearly identified as the emergency contact? <i>49 CFR 172.604(a)(3)(ii)</i>		
8.5	Are the emergency response telephone numbers shown on shipping papers monitored at all times while the hazardous materials are in transportation? <i>49 CFR 172.604(a)(1)</i>		

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8.6	Does the person monitoring the emergency response telephone numbers have the required knowledge of the hazardous materials and emergency procedures, or immediate access to such persons? <i>49 CFR 172.604(a)(2)</i>		

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<b>9.0</b>	<b>Training</b>		
9.1	<i>General Awareness/Familiarization, and Safety Training</i>		
9.1.1	Have all employees, who in the course of employment directly affect hazardous materials transportation safety, been given the required General Awareness/Familiarization, and Safety Training?  (Review employee hazardous material training record for the previous two years.)  <i>49 CFR 172.704(a)(1), (3)</i>		
9.1.2	Have new or transferring employees been trained within 90 days of assignment?  <i>49 CFR 172.704(c)(ii)</i>		
9.2	<i>Function Specific Training</i>		
9.2.1	Have employees been given the appropriate "Function-specific" training for their job assignments?  <i>49 CFR 172.704 (a)(2)(i)</i>		
9.2.2	Do training records contain employee's names, dates of training, description, copy or location of training materials, name and address of training and certification that the employee has been trained and tested?  <i>49 CFR 172.704(d)(1), (2), (3), (4), (5)</i>		

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