

# R L C Oilfield Services, LLC

## Vehicle Inspection & Maintenance Policy

**R L C Oilfield Services, LLC**, herein after referred to as "Company", is committed to the safe operation and maintenance support of our commercial motor vehicle fleet. The purpose of this policy is to define the procedures by which we will ensure our safe operations of commercial motor vehicles, to define the individuals responsible for each aspect of the policy and to comply with the Federal Motor Carrier Safety Regulations (49 CFR Part 396).

Company will provide safe and reliable vehicles which are mechanically sound and are regularly inspected and maintained.

Company officials who are responsible for safety will either maintain or cause to be maintained all records pertaining to maintenance, repair, and inspection of all commercial motor vehicles, and will maintain these records for the period of time required to be in compliance with 49 CFR Part 396.

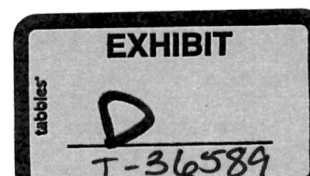
Designated maintenance personnel are responsible for keeping or causing contract maintenance providers to keep vehicles or other equipment functioning properly through preventive maintenance or regular service, repair, and inspection. Maintenance personnel are also responsible for ensuring or causing contract maintenance providers to ensure that all safety related repairs are made as indicated on vehicle inspection reports and to provide the required documentation for all service and repairs.

Drivers are responsible for proper and safe operation of vehicles, reporting of any problems or defects with any vehicles in a timely manner, and not to operate any vehicle if it is likely to breakdown or cause an accident due to mechanically deficiency. Drivers are also responsible to conduct proper pre- and post-trip vehicle inspections prior to operating, and immediately following the operation of a vehicle, with post-trip inspections being documented on a daily vehicle inspection report and turn this report in to designated maintenance personnel in a timely manner. The vehicle inspection process will cover the following components of the equipment:

Drive line	Tires, wheels, rims	Suspension system	Body
Glass	Fuel system	Cooling system	Engine
Leaks	Exhaust	Frame	Headlights
Tail lights	Stop & turn lights	Clearance markers & lights	Reflectors
Speedometer	Oil pressure	Ammeter	Clutch
Horn(s)	Windshield wiper	Parking brakes	Service brakes
Transmission	Rear vision mirrors	Steering	Speedometer
Low air pressure warning device			

### Emergency equipment

Reflective triangles	Fire extinguisher
Flags	Spare bulbs / fuses



Contract maintenance personnel are responsible to provide Company with all required documentation related to the maintenance functions and the qualifications of individuals performing those functions.

Company will ensure that all commercial motor vehicles are inspected annually in accordance with the requirements 49 CFR Part 396 regarding FHWA annual vehicle inspections. Record of these inspections shall be maintained in the Company's permanent equipment maintenance files and the FHWA annual inspection sticker shall be attached to the side of each vehicle.

Company will perform or cause a contract maintenance provider to perform regularly scheduled preventative maintenance on all commercial motor vehicles to ensure continued safe operating condition of these vehicles.

Company will ensure that mechanics assigned to perform work on brake systems on Company's units that are equipped with air-brakes are qualified in compliance with 49 CFR Part 396.25 (d).

*I hereby acknowledge that I have read and understand this policy and that I fully understand my responsibilities under this policy.*

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Driver's signature

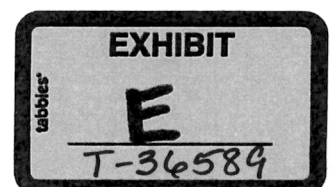
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Date

# R L C OILFIELD SERVICES, LLC

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TRANSPORTATION OF NON-HAZARDOUS OILFIELD  
WASTE AND NON-HAZARDOUS INDUSTRIAL  
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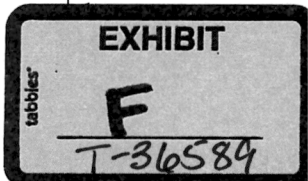
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### Synopsis

The purpose of this section is to provide information regarding the application of the Department of Transportation (DOT) regulations to Non-Hazardous materials transported by RLC OILFIELD SERVICES, LLC personnel. The section applies to all RLC OILFIELD SERVICES, LLC facilities, work sites and employees. Non-Hazardous oilfield waste and industrial solid waste is defined as unwanted substances or mixture of substances that result from the construction, operation or reclamation of a well site, oil and gas battery, gas plant, compressor station, crude oil terminal, pipeline, or related facility.

### Initial Implementation Requirements:

- Appoint a Designated Person to coordinate Non-Hazardous material transportation.
- Identify Scope of Applicability at Site/Facility Operations with the Requirements of this Section
  - ▶ Identify all Non-Hazardous materials transported by RLC OILFIELD SERVICES, LLC employees.
  - ▶ Identify all Non-Hazardous materials and wastes transported by a contracted service provider.
  - ▶ Prepare a "short list" of site-specific Non-Hazardous material and Non-Hazardous waste shipping descriptions.

### Recurring and Annual Task Requirements:

- Identify and Verify Shipping Descriptions, Labeling and Marking to be used on Containers and Shipping Documents during Length of Contract.
- Train Affected Personnel in Their Role of Ensuring Compliance with DOT and EPA Transportation Requirements
- Inspect Labeling, Marking and Paperwork prior to Signing Shipping Document and Releasing Non-Hazardous Materials/Non-Hazardous Waste for Transportation
- Ensure Signed Copy of Non-Hazardous Waste Manifest is Returned From the Treatment, Storage and Disposal Facility (TSDF) Within 45-Days

**RLC OILFIELD SERVICES,**

<b>Transportation of Non-Hazardous Materials and Waste Checklist</b>	<b>YES</b>	<b>NO</b>	<b>NA</b>
1. Has the work site identified all the Non-Hazardous materials regulated by the U.S. Department of Transportation (DOT) that are transported by RLC OILFIELD SERVICES, LLC employees?	-	-	-
2. Have all RLC OILFIELD SERVICES, LLC employees who transport these Non-Hazardous materials received instruction on proper labeling and marking as well as methods to secure these materials during transport?	-	-	-
3. Have all DOT Non-Hazardous materials that are transported from the facility or work site by a contracted hauler been identified?	-	-	-
4. Has a listing been prepared for each DOT Non-Hazardous material identifying the material, its proper shipping name, the appropriate markings, and allowable shipping containers to be used?	-	-	-

TRANSPORTATION OF NON-HAZARDOUS MATERIALS AND WASTE

1.1 Purpose and Scope

RLC OILFIELD SERVICES, LLC personnel provides specific guidance for transportation of Non-Hazardous materials and waste.

1.2 Definitions

<b>Labeling</b>	The application of non-hazard warning labels are in accordance with DOT.
<b>Marking</b>	The descriptive name, instructions and cautions include the proper shipping name, the identification number, other regulated material (ORM) designations, internal packaging, and specific requirements for various types of tanks.
<b>Operating Unit</b>	RLC OILFILED SERVICES, LLC

### **1.3 Transportation of Non-Hazardous Materials and Waste**

#### **1.3.2 Shipping Papers**

Anyone who offers a Non-Hazardous material for transportation is will describe the material on a shipping paper. This document accompanies the shipment to its destination and serves as a record of the shipment, the transporter used and final disposition of the Non-Hazardous materials shipped from RLC OILFIELD SERVICES, LLC facilities and work locations.

##### **1.3.2.1 General Entries**

While non-regulated items may be included on the same shipping paper as regulated Non-Hazardous materials, the Non-Hazardous material entries will be identified.

1.3.2.1.1 All copies of shipping papers must be legible and printed (mechanically or manually) in English.

1.3.2.1.2 Unless allowed, no abbreviations may be used in the description.

1.3.2.1.3 Additional information about the material may be added, but it must be placed after the "basic description."

1.3.2.1.4 If more than one sheet is necessary, ensure that it is sequentially numbered indicating the number of pages (i.e., 1 of 4 pages).

##### **1.3.2.2 Emergency Response Telephone Number**

A 24-hour emergency response telephone number for use in the event of an emergency involving the shipped Non-Hazardous material must be provided on the shipping paper. The number must have immediate access to a person who is knowledgeable of the material and emergency response mitigation information for the material.

#### **1.3.3 Non-Hazardous Waste Manifest**

Non-Hazardous Waste Management Program use of the manifest. This document is designed to record the movement of Non-Hazardous waste from the generator through the transporter(s) and any intermediate storage sites, to the site where it is to be treated or disposed.

##### **1.3.3.1 General Requirements**

The manifest must be prepared by the generator prior to transporting the waste off-site. Since the generator must designate on the manifest the permitted facility to which the waste is to be delivered, prior contact with the treatment, storage, and disposal facility (TSDF) will be required in most cases. The generator can also specify an alternate TSDF to which the transporter can deliver the waste in case of an emergency.

If, for some reason, the transporter is unable to deliver the Non-Hazardous waste to either the designated or alternate facility, the transporter must contact the generator. The generator, in turn, must either designate another facility or instruct the transporter to return the waste.

Under this system, the transporter can only deliver the waste where the generator has instructed.

#### 1.3.3.2 Information Required on the Manifest

- 1.3.3.2.1 A manifest document number preprinted by the printer.
- 1.3.3.2.2 The name, address, telephone number, and EPA or State identification number of the generator.
- 1.3.3.2.3 The Emergency Response phone number for the generator - only if one number is applicable to the entire shipment. If different for specific materials, the number is entered after each DOT description.
- 1.3.3.2.4 The name of each transporter.
- 1.3.3.2.5 The name, address, and EPA identification number of the designated TSDF and the alternate, if any.
- 1.3.3.2.6 The DOT description
- 1.3.3.2.7 The number for each waste.
- 1.3.3.2.8 The total quantity of waste with units indicated.
- 1.3.3.2.9 The waste code or codes applicable to the waste.
- 1.3.3.2.10 The signature of the Generator/Offeree to certify that the shipment is properly prepared and in proper condition for transport.

#### 1.3.3.3 Number of Copies

The manifest is designed to provide enough copies so that the generator, each transporter, and the TSDF will each have one copy with an additional copy to be returned to the generator by the TSDF. This usually means at least a 4-part form is required. If more than one transporter is used, the number of copies must increase accordingly.

Some State agencies also require copies of the manifest - potentially two copies for the generator's State agency and the disposer's State agency.

#### 1.3.3.4 Use of the Manifest

During its use, the uniform manifest must accompany the waste shipment from the generator, through each transporter to the designated TSDF.

The generator:

- 1.3.3.4.1 Signs the manifest
- 1.3.3.4.2 Has the transporter sign and date upon pickup of the Non-Hazardous waste
- 1.3.3.4.3 Removes one copy for his records
- 1.3.3.4.4 Gives the remaining copies to the next transporter or the designated facility.
- 1.3.3.4.5 When the signed copy is returned by the designated facility, it can be added with or replace the original copy signed only by the generator and transporter.

The transporter will then:

- 1) Have either the next transporter or the designated facility (whichever is applicable) sign and date the manifest upon receipt of the waste shipment

- 2) Retain a copy for his or her records
- 3) Give the remaining copies to the next transporter or the designated facility.

The designated facility will:

- 1) Retain a copy of the manifest for its records
- 2) Return a copy of the completed, signed manifest to the generator to acknowledge receipt of the shipment.

#### **1.4 Emergency Response Communication Standards**

In an effort to improve the communication of emergency response information for Non-Hazardous materials transported in commerce, the DOT requires that certain information be provided and maintained by the shipper.

##### **a. Emergency Response Information**

Emergency response information that can be used in the mitigation of an incident involving Non-Hazardous materials must be maintained by carriers and facility operators who receive, store or handle Non-Hazardous materials during transportation.

At a minimum, the information must include the DOT description of the Non-Hazardous material, information on immediate hazards to health, risks of fire or explosion, immediate precautions and methods for handling spills, leaks or fires and preliminary first aid measures.

Facilities must maintain the information whenever the Non-Hazardous material is present and the information must be immediately accessible to personnel and available for use away from the package containing the material.

The information may be presented on the shipping paper.

A 24-hour emergency response telephone number is required on most shipping documents describing Non-Hazardous materials. The telephone number must either contact a person knowledgeable of the hazards, characteristics, and mitigation information of the shipped commodity or one who has immediate access to someone who does.

The emergency telephone number is to be accessible on a 24-hour basis. The number is to be placed on the shipping paper, immediately following the description. If designated by the person offering the shipment, the telephone number may be to another organization that has accepted responsibility for providing the detailed information.

### 1.5 Non-Hazmat Employee Training

RLC OILFIELD SERVICES, LLC provides training regarding safe loading, unloading, handling, and transporting of Non-Hazardous materials as well as emergency procedures for responding to accidents/incidents involving the transportation of Non-Hazardous materials. The purpose of the RLC requirements is to increase a non-hazmat employee's awareness of safety considerations and regulatory requirements in order to reduce the occurrence of Non-Hazardous material incidents caused by human error.

To achieve this goal, we provide our employees with the training listed below.

Function-Specific Training (i.e. skills, knowledge to perform job related to DOT- specified requirements or ICAO Technical instruction or IMDG-Code as applicable)

- a. Backing Safety Training
- b. Decisive Driver Training
- c. Pre / Post Trip Inspection Training
- d. Tanker Rollover Prevention Training

**TRANSPORTATION OF HAZARDOUS  
MATERIALS AND WASTE**

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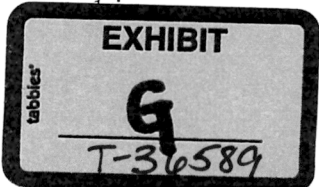
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## Synopsis

The purpose of this section is to provide information regarding the application of the Department of Transportation (DOT) regulations to hazardous materials transported by or offered by RLC OILFIELD SERVICES, LLC personnel. The section applies to all RLC OILFIELD SERVICES, LLC facilities, work sites, and employees.

### Initial Implementation Requirements:

- Appoint a Designated Person to coordinate hazardous material transportation
- Identify Scope of Applicability at Site/Facility Operations with the Requirements of this Section
  - ▶ Identify all hazardous materials transported by RLC OILFIELD SERVICES, LLC employees
  - ▶ Identify all hazardous materials and wastes transported by a contracted service provider
  - ▶ Prepare a "short list" of site-specific hazardous material and hazardous waste shipping descriptions.

### Recurring and Annual Task Requirements:

- Meet with Transporter to Identify and Verify Shipping Descriptions, Labeling and Marking to be used on Containers and Shipping Documents during Length of Contract.
- Periodically (at least semi-annually), Inventory Types and Quantities of Hazardous Materials Transported Off-site by RLC OILFIELD SERVICES, LLC Personnel for Use at Remote Work Locations (3.6)
- Train Affected Personnel in Their Role of Ensuring Compliance with DOT and EPA Transportation Requirements (3.6, 3.10)
- Inspect Labeling, Marking and Paperwork Prepared by Transportation Service Provider Prior to Signing Shipping Document and Releasing Hazardous Materials/Hazardous Waste for Transportation (3.6)
- Ensure Signed Copy of Hazardous Waste Manifest is Returned From the Treatment, Storage and Disposal Facility (TSDF) Within 45-Days

**RLC OILFIELD SERVICES,**

<b>Transportation of Hazardous Materials and Waste Checklist</b>		<b>YES</b>	<b>NO</b>	<b>NA</b>
1.	Has the work site identified all the hazardous materials regulated by the U.S. Department of Transportation (DOT) that are transported by RLC OILFIELD SERVICES, LLC employees?	-	-	-
2.	Have all RLC OILFIELD SERVICES, LLC employees who transport these hazardous materials received instruction on proper labeling and marking as well as methods to secure these materials during transport?	-	-	-
3.	Have all DOT hazardous materials that are transported from the facility or work site by a contracted hauler been identified?	-	-	-
4.	Has a listing been prepared for each DOT hazardous material identifying the material, its proper shipping name, the appropriate markings, and allowable shipping containers to be used?	-	-	-

**TRANSPORTATION OF HAZARDOUS MATERIALS AND WASTE**

**1.1 Purpose and Scope**

RLC OILFIELD SERVICES, LLC personnel provides specific guidance for transportation of hazardous materials.

**1.2 Definitions**

<b>Labeling</b>	The application of hazard warning labels as prescribed in the Hazardous Materials Table.
<b>Marking</b>	The descriptive name, instructions and cautions designated for a hazardous material in 49 CFR 172.300. Marking includes the proper shipping name, the identification number, other regulated material (ORM) designations, internal packaging, and specific requirements for various types of tanks.
<b>Operating Unit</b>	RLC OILFIELD SERVICES, LLC
<b>Placarding</b>	The application of DOT-designed hazard warning sign(s) to the outside of the shipping vehicle.

## 1.3 Transportation of Hazardous Materials

### 1.3.1 Hazardous Material Table

The DOT designates materials as hazardous by listing them upon the Hazardous Materials Table (HMT). The HMT is an alphabetical list of commodities or items that identifies:

- a. The material's hazard class or that the material is forbidden in transportation
- b. The proper shipping name or direction to the preferred proper shipping name
- c. Specific references or references to requirements in the HMR pertaining to labeling, packaging, quantity limits aboard aircraft and stowage of hazardous materials aboard vessels.

The HMT consists often (10) columns of information that is used to fulfill the requirements for a given shipment. The HMT is found in 49 CFR 172.101. Due to its length and on-going potential for revision, reference a current copy at DOT HMT.

Appendix A to the HMT is the List of Hazardous Substances and Reportable Quantities. The Appendix lists materials and their corresponding reportable quantities (RQs) that are designated as "hazardous substances" by CERCLA. It is used to determine the need for additional information to be provided on shipping documents and containers. Because the EPA has the legal responsibility to determine the reportable quantities for the DOT, these RQs can be found in Appendix B to this manual.

### 1.3.2 Shipping Papers

Anyone who offers a hazardous material for transportation is required to describe the material on a shipping paper as specified in 49 CFR 172.200-204. This document accompanies the shipment to its destination and serves as a record of the shipment, the transporter used and final disposition of the hazardous materials shipped from RLC OILFIELD SERVICES, LLC facilities and work locations.

#### 1.3.2.1 General Entries

While non-regulated items may be included on the same shipping paper as regulated hazardous materials, the hazardous material entries must be identified as denoted in §172.201(a)(1).

#### 1.3.2.2 Contents

- 1.3.2.2.1 All copies of shipping papers must be legible and printed (mechanically or manually) in English.
- 1.3.2.2.2 Unless allowed, no abbreviations may be used in the description.
- 1.3.2.2.3 Additional information about the material may be added, but it must be placed after the "basic description."
- 1.3.2.2.4 If more than one sheet is necessary, ensure that it is sequentially numbered indicating the number of pages (i.e., 1 of 4 pages).

#### 1.3.2.3 Emergency Response Telephone Number

A 24-hour emergency response telephone number for use in the event of an emergency involving the shipped hazardous material must be provided on the shipping paper. The number must have immediate access to a person who is knowledgeable of the material and emergency response mitigation information for the material

#### 1.3.2.4 Description of Hazardous Material on Shipping Papers

The "shipping description" of a hazardous material on shipping papers must include the following items in the following order:

- 1.3.2.4.1 The proper shipping name as prescribed in column 2 of the HMT
- 1.3.2.4.2 The hazard class or division prescribed in column 3 of the HMT
- 1.3.2.4.3 The identification number prescribed in column 4 of the HMT
- 1.3.2.4.4 The packaging group in roman numerals prescribed (if any) in column 5 of the HMT, preceded by "PG"
- 1.3.2.4.5 The total quantity, by net or gross mass, capacity or other appropriate units (use of abbreviations is allowed).
- 1.3.2.4.6 Empty packaging - a description for a packaging containing the residue of a hazardous material may include "Residue: Last Contained" in association with the basic description of the hazardous material last contained in the package.
- 1.3.2.4.7 Elevated temperature materials - the word "HOT" must be noted preceding the proper shipping name if a liquid material meets the definition in §171.8.
- 1.3.2.4.8 Organic peroxides (Class 5.2) and self-reactive (Class 4.1) materials must include additional information as required by 49 CFR 172.203(o).
- 1.3.2.5 Each shipping document must contain a certification as specified in 49 CFR 172.204 to assure that the described materials have in all respects met the applicable requirements of the DOT. Additional certification requirements are specified for transport by cargo and passenger aircraft and for radioactive materials.

### 1.3.3 Marking and Labeling

When a material is offered for shipment, each container must be properly marked and labeled. While one often assumes these terms have the same meaning, the DOT specifies two distinct regulatory programs to accomplish the identification of hazardous materials.

**Marking** is defined by the DOT as the application of the descriptive name, instructions and cautions designated in 49 CFR 172.300. Marking includes the proper shipping name, the identification number, ORM designations, internal packaging, and specific requirements for portable tanks, cargo tanks, tank cars, and radioactive materials. This information may be applied directly to the container with paint, marker, etc. or on an adhesive-backed sticker.

**Labeling** requirements are found in 49 CFR 172.400 and specify the application of hazard warning labels prescribed in the HMT. Additional labeling requirements are specified for radioactive materials and multiple hazard materials and packaging.

In general, labeling is the application of the DOT hazard warning labels specified in the HMT and marking is the application of other required information on the container.

1.3.3.1 Marking

Anyone who offers a hazardous material for transport must mark each package, freight container and transport vehicle containing a hazardous material according to 49 CFR 172 Parts 300-338.

The following summary identifies selected markings for hazardous materials in non-bulk packaging:

- 1.3.3.1.1 The proper shipping name as it appears in the DOT HMT column 2 (49 CFR 172.301).
- 1.3.3.1.2 The identification number as it appears in column 4 of the DOT HMT. The number is not required on packages of "limited quantities" or ORM-D material.
- 1.3.3.1.3 The proper shipping name for a hazardous waste is not required to include the word "waste" if the package bears the EPA marking as required by 40 CFR 262.32.
- 1.3.3.1.4 The technical chemical name of the hazardous material or substance must be marked.  
in parentheses if column 1 of the HMT indicates a "G", and/or the selected shipping name does not otherwise identify the chemical/material (49 CFR 172.301 and 172.324).
- 1.3.3.1.5 Packages containing inner containers of liquid hazardous material must be marked with the "this end up" an-ow designation. There are numerous exceptions to this requirement (see 49 CFR 172.312).
- 1.3.3.1.6 The words "Inhalation Hazard" must be marked on packages of poisonous inhalation materials (49 CFR 172.313).
- 1.3.3.1.7 Materials classified as a consumer commodity must be marked ORM-D or ORM-D-Air if being transported by air (49 CFR 172.316).
- 1.3.3.1.8 Marine pollutants shipped by vessel and/or in bulk quantities must be marked as specified (49 CFR 172.322).
- 1.3.3.1.9 The letters "RQ" (for reportable quantity) must be displayed in association with the proper shipping description for each package containing the reportable quantity of a hazardous substance (49 CFR 172.313).

The required markings must be:

- Durable
- In English
- Printed or affixed to the surface of a package or a label, tag or sign.
- Displayed on a background of a contrasting color.
- Unobstructed by labels or attachments
- Located away from any other marking (i.e. advertising) that could substantially reduce its effectiveness.

1.3.3.2 Labeling

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Each person who offers for transport or transports a hazardous material in a non-bulk  
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package, a bulk packaging or over pack with a capacity less than 640 cubic feet or portable tank with a capacity of less than 1,000 gallons must label the hazardous material as required in column 6 of the HMT. Labeling requirements are found in 49 CFR 172 Parts 400-450.

The following summary identifies selected labeling requirements.

- 1.3.3.2.1 Packages must be labeled with the proper DOT label as shown in column 6 of the HMT (49 CFR 172.400).
- 1.3.3.2.2 Subsidiary Hazard Labels. Some substances have more than one hazardous characteristic. The DOT regulations require that some of these materials be labeled with more than one label to reflect the additional hazard. Column 6 specifies the required labels (49 CFR 172.402).
- 1.3.3.2.3 Radioactive materials that also meet the definition of one or more additional hazards must be labeled as radioactive material as well as for each additional hazard (49 CFR 172.403).
- 1.3.3.2.4 Mixed Packaging. When hazardous materials having different hazard classes are packed in the same container or overpack, the outside packaging must be labeled for each hazard class of the hazardous material in the container (49 CFR 172.404).
- 1.3.3.2.5 Consolidated Packaging. When two or more packages containing compatible HM are placed within the same outside container or overpack, the outside container or overpack must be labeled for each hazard class of the HM contained therein (49 CFR 172.404).
- 1.3.3.2.6 Labels may not be modified unless authorized in 49 CFR 172.405.
- 1.3.3.2.7 Labels must be printed on or affixed to the surface of the package near the proper shipping name (49 CFR 172.406).
- 1.3.3.2.8 DOT labels must meet the criteria listed in 49 CFR 172.407.
- 1.3.3.2.9 The word "toxic" can be used in lieu of the word "poison" on the Poison label.
- 1.3.3.2.10 Labeling exemptions exist for numerous materials and packages. See 49 CFR 172.400a. Labels must be:
  - 1.3.3.2.10.1 Printed or affixed to a surface (other than the bottom) of the package.
  - 1.3.3.2.10.2 Placed near the proper shipping name marking.
  - 1.3.3.2.10.3 When a subsidiary label or multiple labels are required, it must be placed within 6-inches of the primary hazard label.
  - 1.3.3.2.10.4 Clearly visible and may not be obscured by markings.

#### **1.3.4 Placarding**

The DOT regulations require placarding of shipments of hazardous materials depending on the hazard class and quantity. Hazardous material placards look very much like hazardous material warning labels in terms of shape, color, and design. Placards are used to alert people of the potential dangers associated with the type of hazardous material being

## RLC OILFIELD SERVICES,

transported in a motor vehicle, railcar, freight container, cargo tank, or portable tank. They also guide emergency personnel in their response to spills or accidents involving the hazardous material.

- 1.3.4.1 Each person who offers for transportation or transports any hazardous material must utilize the appropriate placards. 40 CFR 262.33 requires a generator of hazardous waste to placard or offer the initial transporter the appropriate placards.
- 1.3.4.2 A hazardous material must be placarded as specified in Tables 1 and 2 of 49 CFR 172.504.
- 1.3.4.2.1 Table 1 - Hazard classes identified on Table 1 are required to be placarded whenever any quantity is transported. While contract haulers normally have the placards for the transport vehicle, the RLC OILFIELD SERVICES, LLC must ensure the correct placard is used.
- 1.3.4.2.2 Table 2 - Hazard classes identified on Table 2 are exempted from placarding requirements when less than 454 kg (1,001 pounds) aggregate gross weight of hazardous material are being transported.
- 1.3.4.3 Dangerous placard. When a transport vehicle (et.al.) contains non-bulk packages with two or more different hazard categories of materials that would otherwise require different placards specified in Table 2, the "Dangerous" placard may be applied instead of the hazard-specific placards. If any hazard class category exceeds 1,000 kg (2,205 pounds) aggregate gross weight (loaded at one facility), then the individual placard for the hazard category must be applied.
- 1.3.4.4 Exception for less than 454 kg (1,001 pounds). When non-bulk packages that contain less than 454 kg (1,001 pounds) aggregate gross weight of HM covered in Table 2 are transported by highway, no placard is required.
- 1.3.4.5 Hazardous material placards must be displayed on each end and each side of a motor vehicle or other transport vehicle and be readily visible.
- 1.3.4.6 Placarding requirements may vary according to the mode of transport (highway, rail, water, air) and the type of transport vehicle or container.
- 1.3.4.7 Hazardous materials that possess a subsidiary hazard as described in 49 CFR 172.505 must apply additional placarding to the vehicle.
- 1.3.4.8 Placarding exceptions are specified in 49 CFR 172.504(d) (f).

Table 1. Placarding Requirements by Category	
Category of material (Hazard class or division number and additional description, as appropriate)	Placard name
1.1	EXPLOSIVES 1.1
1.2	EXPLOSIVES 1.2
1.3	EXPLOSIVES 1.3
2.3	POISON GAS
4.3	DANGEROUS WHEN WET
5.2 (Organic peroxide, Type B, liquid or solid, temperature controlled)	ORGANIC PEROXIDE
6.1 (inhalation hazard. Zone A or B)	POISON INHALATION HAZARD



7 (Radioactive Yellow III label only)	RADIOACTIVE <sup>1</sup>
<b>Table 2. Placarding Requirements by Category</b>	
<b>Category of material (Hazard class or division number and additional description, as appropriate)</b>	<b>Placard name</b>
1.4	EXPLOSIVES 1.4
1.5	EXPLOSIVES 1.5

<sup>1</sup> RADIOACTIVE placard also required for exclusive use shipments of low specific activity material and surface contaminated objects transported in accordance with §173.427(a) of this sub chapter.

1.6	EXPLOSIVES 1.6
2.1	FLAMMABLE GAS
2.2	NON-FLAMMABLE GAS
3	FLAMMABLE
Combustible liquid	COMBUSTIBLE
4.1	FLAMMABLE SOLID
4.2	SPONTANEOUSLY COMBUSTIBLE
5.1	OXIDIZER
5.2 (Other than organic peroxide, Type B, liquid or solid, temperature controlled)	ORGANIC PEROXIDE
6.1 (inhalation hazard, Zone A or B)	POISON
6.2	(None)
8	CORROSIVE
9	CLASS 9 [SEE §172.504(f)(9)]
ORM-D	(None)

#### 1.4 Transportation of Hazardous Waste

The EPA mandates the requirements for generators of hazardous waste in 40 CFR 262.

When a generator transports or offers for transportation a hazardous waste, the EPA specifies a number of requirements to be fulfilled in order to ensure appropriate management and protection of health, safety and the environment.

##### 1.4.2 Hazardous Waste Manifest

The key to the RCRA Hazardous Waste Management Program is the use of the manifest. This document is designed to record the movement of hazardous waste from the generator through the transporter(s) and any intermediate storage sites, to the site where it is to be treated or disposed.

###### 1.4.2.1 General Requirements

The manifest must be prepared by the generator prior to transporting the waste off-site. Since the generator must designate on the manifest the permitted facility to which the waste is to be delivered, prior contact with the treatment, storage, and disposal facility (TSDF) will be required in most cases. The generator can also specify an alternate TSDF to which the transporter can deliver the waste in case of an emergency.

If, for some reason, the transporter is unable to deliver the hazardous waste to either the

designated or alternate facility, the transporter must contact the generator. The generator, in turn, must either designate another facility or instruct the transporter to return the waste.

Under this system, the transporter can only deliver the waste where the generator has instructed.

#### 1.4.2.2 Information Required on the Manifest

**Due to an overhaul of the manifest program (40 CFR 262.23 and 40 CFR 262 Appendix) which occurred on September 5, 2006 (40 CFR 262- 263) the manifest has been standardized and all State-modified manifests have been eliminated.**

The EPA specifies that the manifest contain the following information:

- 1.4.2.2.1 A manifest document number preprinted by the printer.
- 1.4.2.2.2 The name, address, telephone number, and EPA or State identification number of the generator.
- 1.4.2.2.3 The Emergency Response phone number for the generator - only if one number is applicable to the entire shipment. If different for specific materials, the number is entered after each DOT description.
- 1.4.2.2.4 The name and EPA identification number of each transporter. If more than two, use the Manifest Continuation Sheet to document.
- 1.4.2.2.5 The name, address, and EPA identification number of the designated TSDF and the alternate, if any.
- 1.4.2.2.6 The DOT description (including proper shipping name, hazard class or division, identification number and packing group) as per 49 CFR 172.
- 1.4.2.2.7 The number and type of containers for each waste.
- 1.4.2.2.8 The total quantity of waste with units indicated.
- 1.4.2.2.9 The waste code or codes applicable to the waste.
- 1.4.2.2.10 The signature of the Generator/Officer to certify that the shipment is properly prepared and in proper condition for transport. In addition, the generator is certifying the waste minimization certification.

The generator's certification is found in 40 CFR 262.27 and reads:

"I am a large quantity generator. I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment"

OR,

"I am a small quantity generator. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."

By signing this document, generators of over 1,000 kg/month affirm that they have a program of waste minimization in place. Generators of between 100 and 1,000 kg/month merely affirm that they have made a "good faith effort" to minimize their waste

generation. The EPA clarified this "good faith effort" to mean that these generators need only "consider" the waste minimization options available to them.

Although small quantity and very small quantity generators are not legally bound by this statement, when signing the manifest, best management practices require they also comply with these conditions.

When a party other than the generator prepares the shipment for transportation, this party may also sign the shipper's certification statement as the offeror of the shipment.

The words "On behalf of" in the signature block (handwritten or preprinted) indicate that the individual signs as the employee or agent of the named principal.

#### 1.4.2.3 Obtaining the Manifest.

To ensure standardization and consistency of the printed manifest, the EPA has established a "*Manifest Registry*" to provide oversight for the document.

Anyone (i.e., businesses, individuals, or agencies) wishing to print the manifest must secure EPA approval. Registrants submitting an application and form samples for EPA evaluation must obtain EPA approval prior to distribution and/or use.

A generator must obtain and use a manifest that has been procured from an approved, registered printer.

A table of "*Approved Registered Printers for the Manifest*" can be found at <http://www.epa.gov/epawaste/hazard/transportation/manifest/registry/printers.htm>

#### 1.4.2.4 Number of Copies

The manifest is designed to provide enough copies so that the generator, each transporter, and the TSDF will each have one copy with an additional copy to be returned to the generator by the TSDF. This usually means at least a 4-part form is required. If more than one transporter is used, the number of copies must increase accordingly.

Some State agencies also require copies of the manifest - potentially two copies for the generator's State agency and the disposer's State agency.

#### 1.4.2.5 Use of the Manifest

During its use, the uniform manifest must accompany the waste shipment from the generator, through each transporter to the designated TSDF.

The generator:

- 1.4.2.5.1 Signs the manifest
- 1.4.2.5.2 Has the transporter sign and date upon pickup of the hazardous waste
- 1.4.2.5.3 Removes one copy for his records
- 1.4.2.5.4 Gives the remaining copies to the next transporter or the designated facility.
- 1.4.2.5.5 When the signed copy is returned by the designated facility, it can be added with or replace the original copy signed only by the generator and transporter.

The transporter will then:

- 1) Have either the next transporter or the designated facility (whichever is applicable) sign and date the manifest upon receipt of the waste shipment

**RLC OILFIELD SERVICES,**

- 2) Retain a copy for his or her records
- 3) Give the remaining copies to the next transporter or the designated facility.

The designated facility will:

- 1) Retain a copy of the manifest for its records
- 2) Return a copy of the completed, signed manifest to the generator to acknowledge receipt of the shipment.

**1.4.2.6 Pre-Transport Requirements**

Before a shipment of hazardous waste is transported off-site, the EPA requires the generator to comply with the DOT regulations regarding packaging, labeling, marking and placarding (as specified in 3.7 - Transportation of Hazardous Materials).

- 1.4.2.6.1 Packaging - all packaging used for off-site shipment of hazardous wastes must conform to the DOT regulations found in 49 CFR 173, 178 and 179.
- 1.4.2.6.2 Labeling - each package of hazardous waste must be labeled in accordance with DOT regulations for hazardous materials under 49 CFR 172 (i.e. flammable gas, oxidizer, corrosive material, etc.).
- 1.4.2.6.3 Marking - each package of hazardous waste must be marked in accordance with the DOT regulations for hazardous materials under 40 CFR 172. At a minimum, the proper DOT shipping name (which includes the hazard class and UN/NA number) must be clearly marked on each container. In addition, the EPA requires that each container under 119-gallons in capacity must have the EPA-mandated marking that says:

<p style="text-align: center;"><b>HAZARDOUS WASTE</b></p> <p>Federal Law Prohibits Improper Disposal. If Found,</p> <p>Contact the nearest police or public safety authority</p> <p>Or the U.S. Environmental Protection Agency.</p> <p>Generator's Name and Address _ _ _ _ _</p> <p>Generator's EPA Identification Number _ _ _ _ _</p> <p>Manifest Tracking Number _ _ _ _ _</p>
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**NOTE:** Within the DOT system, this is not a "label." It is a "marking." Several companies supply adhesive-backed EPA Hazardous Waste markings which usually contain spaces for additional information that is not required by the EPA

- 1.4.2.6.4 Placarding - prior to transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must placard or offer the initial transporter the appropriate DOT placard.

## **1.5 Emergency Response Communication Standards**

In an effort to improve the communication of emergency response information for hazardous materials transported in commerce, the DOT requires that certain information be provided and maintained by the shipper.

### **a. Emergency Response Information (49 CFR 172.602)**

Emergency response information that can be used in the mitigation of an incident involving hazardous materials must be maintained by carriers and facility operators who receive, store or handle hazardous materials during transportation.

At a minimum, the information must include the DOT description of the hazardous material, information on immediate hazards to health, risks of fire or explosion, immediate precautions and methods for handling spills, leaks or fires and preliminary first aid measures.

Facilities must maintain the information whenever the hazardous material is present and the information must be immediately accessible to personnel and available for use away from the package containing the material.

The information may be presented on the shipping paper or referenced to another document that contains the required information (i.e. the Emergency Response Guidebook); aboard aircraft, the International Civil Aviation Organization (ICAO) "Emergency Response Guidance for Aircraft Incidents Involving Dangerous Goods" and aboard vessels, the International Maritime Organization (IMO) "Emergency Procedures for Ships Carrying Dangerous Cargo").

If the DOT Emergency Response Guidebook (ERG) is used as reference for the required information, use of the initials "ERG" followed by the appropriately assigned guidance number can be used to cross-reference the required information. The cross-reference citation should be placed in conjunction with the material it applies to.

### **b. Telephone Contact for Emergency Response Information (49 CFR 172.604)**

A 24-hour emergency response telephone number is required on most shipping documents describing hazardous materials. Only "limited quantities" and specific commodities are exempt from this requirement. The telephone number must either contact a person knowledgeable of the hazards, characteristics, and mitigation information of the shipped commodity or one who has immediate access to someone who does.

The emergency telephone number is to be accessible on a 24-hour basis. The number is to be placed on the shipping paper, immediately following the description. If designated by the person offering the shipment, the telephone number may be to another organization that has accepted responsibility for providing the detailed information.

## 1.6 Hazmat Employee Training

Each "hazmat employer" is required to train "hazmat employees" (e.g., RLC OILFIELD SERVICES, LLC Environmental Focal Point and others) regarding safe loading, unloading, handling, storing and transporting of hazardous materials as well as emergency procedures for responding to accidents/incidents involving the transportation of hazardous materials. The purpose of the DOT requirements in 49 CFR 172.700 is to increase a hazmat employee's awareness of safety considerations and regulatory requirements in order to reduce the occurrence of hazardous material incidents caused by human error.

To achieve this goal, there are four training requirements that apply to all modes of transportation. The four requirements are:

- a. General Awareness/Familiarization Training (i.e. HM regulations, hazard recognition)
- b. Function-Specific Training (i.e. skills, knowledge to perform job related to DOT-specified requirements or ICAO Technical instruction or IMDG-Code as applicable)
- c. Safety Training (i.e. material hazards, personal protection, handling procedures, remedial actions)
- d. Security Awareness Training (i.e. for those who affect transportation safety - an awareness of security risks associated with hazmat transport).

Section 16.6 provides details on what is required by each of these requirements.

The employer must certify that each employee received training and was tested on appropriate areas of responsibility. New employees and those who change job functions must receive training within 90-days of employment or after changing jobs. Recurrent training is required at least once every three years. A training record must be kept during the employment term plus 90-days after for each employee who completes the training.