



Office of Waste Management and Radiological Protection

Selecting a Waste Transporter and Treatment, Storage, and Disposal Facility

GUIDANCE

Questions to Ask Prospective Transporters and Treatment, Storage and Disposal Facilities (TSDFs)

1. **Hazardous waste** - *Is the hazardous waste transporter currently permitted and registered in Michigan to transport hazardous waste under Act 138? Does the TSDF where the hazardous waste is being taken have a current operating license? You may search the [Waste Data System](http://www.deq.state.mi.us/wdsp/) at www.deq.state.mi.us/wdsp/ for hazardous waste transporters and TSDFs. You may also look for companies in your telephone directory under the heading "Waste Reduction, Disposal, and Recycling Service."*

A TSDF can accept only those types of wastes allowed by its permit or operating license. Special fees may be charged for small quantities of hazardous waste requiring extra handling by the facility.

2. **Liquid industrial waste** - *Is the liquid industrial waste transporter currently permitted and registered to transport liquid industrial waste under Act 138? Is the liquid industrial waste being taken to a facility that has notified the DEQ, Hazardous Waste Program, as a designated facility that accepts liquid industrial waste? You may search the [Waste Data System](http://www.deq.state.mi.us/wdsp/) at www.deq.state.mi.us/wdsp/ for companies that have notified as being liquid industrial waste designated facilities and liquid industrial waste transporters. You may also look for companies that deal with liquid industrial waste in your phone directory under the heading "Waste Reduction, Disposal, and Recycling Service," or for used oils look under the heading "Oils-Waste."*
3. *What type and amount of insurance does the transporter or TSDF carry? Permitted and registered transporters are required to have insurance coverage to cover accidents and environmental spills. You may want to ask for proof of current insurance coverage for your records.*
4. *If you are hiring an independent transporter, find out what TSDF the transporter uses for your type of waste. Do they use a transfer facility? If the waste is going to a treatment facility before disposal, where is the ultimate place of disposal for the treated wastes?*
5. *Does the transporter or the facility offer special services for small volumes of waste? Some transporters might not service Small Quantity or Conditionally Exempt Small Quantity Generators.*
6. *Does the transporter or TSDF initially prepare the waste manifests or will they assist you by reviewing manifests you prepare for correct and complete information? Does the TSDF provide the land ban or land disposal restriction notice forms and do they help complete them?*
7. *Does the transporter test used oil prior to picking up the waste or do they require you to do any testing? Does the TSDF require specific tests or laboratories to be used?*

8. *Is there anything additional to the labeling requirements you must do before your waste is picked up by the transporter or accepted at the TSDf?* Some facilities have their own requirements as to how they accept waste material. For example, some companies will not accept hazardous waste in drums even though this is a common method of storage and only pick up bulk loads.
9. *Does the transporter or TSDf serve other businesses similar to yours?* If so, obtain telephone numbers and contact these companies to evaluate the services they received.
10. *Does the transporter deliver waste to the TSDf the same day that it's picked up?* If not, ask questions about the company/location where the waste will be stored while in transport. Hazardous waste must reach its final destination within 10 days.
11. *What steps does the transporter or TSDf operator take to avoid spills or leaks and minimize the facility's own legal liability?* You may want to note for your records the method of temporary waste storage used at a treatment or recycling facility. If your waste is going to a hazardous waste landfill, ask about their leachate control and ground water monitoring provisions. Use this information when comparing companies. A company that costs more to take your waste but practices an extensive environmental protection program may actually be cheaper in the long run than a company that initially costs less but does not practice adequate environmental protection. If contamination occurs, you can be held financially responsible for the site cleanup costs.
12. *Have any violations of state regulations occurred?* You may also search the [Waste Data System](http://www.deq.state.mi.us/wdsp/) at www.deq.state.mi.us/wdsp/ for information regarding a company's compliance history. Call the appropriate DEQ, [District Office](#), Hazardous Waste Program (see Appendix C) to discuss the compliance history for prospective transporters or a TSDf. Transporter and TSDf inspection files are kept by the Hazardous Waste Program at the DEQ, District Office responsible for the area where the business is located. If you want to review the files, contact the District Office to confirm the appropriate office and set up an appointment to review the records.
13. *Will they enter into a written contract with you?* For liability protection, it is a good idea to have a written contract that clearly identifies what specific services the company will provide. Be cautious of firms who do not want to offer a written contract for services.

Conditionally Exempt Small Quantity Generators are not required to hire a permitted and registered hazardous waste transporter or dispose of hazardous waste at a hazardous waste TSDf, but it must be disposed of at a facility that can legally accept the waste. It is recommended that CESQG exempted hazardous waste be sent to a hazardous waste disposal facility or waste recycler. Your waste that is not considered a liquid waste (passes the paint filter test) can be disposed of at a municipal solid waste landfill if the landfill authority will accept it. Your liquid waste must be hauled by a permitted and registered liquid industrial waste transporter, unless you haul your own generated waste from equipment in which you own and interest and meet the liquid industrial waste self transport requirements in the regulations.

If you are unsure who to talk to about waste, call the **Environmental Assistance Center** at **800-662-9278**, or E-mail deq-ead-envassist@michigan.gov for a referral.

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