

Book review

Transporting Hazardous Waste and Other Materials: A Guide to DOT Regulation, R.A. Goffredi, et al., *The Hazardous Waste Consultant*, 1(5), Elsevier Science Inc., New York, NY, \$75.00, 424 pp., ISBN 0738-0232

A lawyer recently told me that the number of pages in the U.S. Code of Federal Regulations devoted to environmental laws exceeds the number covering the tax code. And those pages dealing with the hazardous wastes are some of the most complex.

U.S. Resource Conservation and Recovery Act (RCRA) regulations require hazardous waste to be shipped in accordance with the Department of Transportation's (DOT's) hazardous material transportation requirements. These requirements, found in the Code of Federal Regulations (49 CFR Parts 100–180) contain provision for classifying, packaging, marking, labeling, shipping and handling hazardous waste shipments.

How to comply with these complex regulations is the topic of this very prodigious compliance manual. The book contains 40 examples, logic diagrams, and discussions of: specific DOT and EPA requirements for shippers (generators) and carriers (transporters); determining when the hazardous material regulations apply to hazardous wastes, CERCLA hazardous substances, and PCBs; classifying materials according to DOT's hazardous class scheme and assigning proper shipping names; selecting DOT-authorized packaging; determining and applying the correct marking, labeling, and placards; preparing hazardous waste manifests or other required shipping papers; and specific requirements for emergency response, training, and registration. The guide also includes:

- Complete text of the 49 CFR 172.101 Hazardous Materials Table, including revisions made by DOT on December 29, 1994 and May 18, 1995;
- Relevant excerpts from more than 70 internal memoranda and other guidance issued by DOT to provide insight into the intent of the regulations;
- An extensive keyword index that cross-references both the text of the guidance manual and the DOT regulations.

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