



Hazardous Waste Update # 5 Limited Time Addendum's (LTA) and National Safety Code Certificates (NSC)

Ministry of Environment
Environmental Management Branch
Business Services

September 2006

INTRODUCTION:

The Hazardous Waste Program has issued Transport Licences to carriers of hazardous wastes since 1988 under the *Waste Management Act* and the *Special Waste Regulation* (presently known as *Environmental Management Act and Hazardous Waste Regulation* respectively). In order for a client to obtain a Hazardous Waste Transport Licence an application and specific documents must be forwarded to the ministry for review. The ministry checks all registered company names, vehicle insurance and registration and manifest documents to ensure the applicants fully understand the obligations related to their licence.

HISTORY:

A number of years ago it was brought to the attention of the ministry that there were situations where a client in possession of a Hazardous Waste Transport Licence needed to use a vehicle that they did not own. These situations usually occurred when a vehicle broke down, the waste was a once a year shipment, or the company did not own a specific piece of equipment required to transport the waste. To allow the use of rental vehicles the ministry developed an addendum to a licence, called a Limited Time Addendum (LTA).

PROBLEM:

In 1998 approximately 44 LTA's were issued, but by 2002 over 144 LTA's were being processed. The increase in LTA's over the years is a considerable amount of work for ministry staff, as well as for the carrier's applying for the LTA's.

In 2002, the ministry approached two carriers who were using the current LTA process and continually adding vehicles and drivers to a LTA. These carriers requested a simplified method to allow them to use equipment for long periods. They also requested the ministry consider a system whereby Owner/Operators (O/O) could be hired under their existing Hazardous Waste Transport Licence. Subsequently, the BC Trucking Association (BCTA) contacted the ministry and requested the use of

the National Safety Certificate (NSC) in conjunction with Special Waste Transport Licences.

The Motor Carrier Commission issues a 'National Safety Code' (NSC) number to those carriers that meet their stringent criteria. The *Motor Vehicle Act* and regulations allow the certificate holders to permit independent O/O to operate under their NSC. The *Environmental Management Act* and the *Hazardous Waste Regulation* do not contain similar provisions.

To meet the urgent need of the industry the ministry has developed a compromise solution to link to the O/O's by the licensee via their NSC Safety Certificate. This solution is to be used on a trial basis until the ministry's legislation and regulations are revised.

INTERIM SOLUTION:

The ministry will implement the use of NSC#'s on transport licences. Licences will be issued with reference to the number and a Licensees' Owner/Operator NSC Safety Certificate Statement. The licence and statement must be with the driver of the vehicle at all times during transportation, along with the manifest form and vehicle registration and insurance documents.

TO APPLY FOR A NSC TYPE LICENCE:

Obtain a copy of the licence application documents by mail, facsimile or from the program web site.

<http://www.env.gov.bc.ca/epd/epdpa/sw/sw.html>

- Hazardous Waste Transport Licence Application
- Licensees' Owner/Operator NSC Statement
- List of Owner/Operators.

Complete all documents to apply for a new, renewal, or revision of a Hazardous Waste Transport Licence. Forward the complete forms and all related documents to the ministry to be processed.

Hazardous Waste Update Bulletins are published as required to assist professionals in the field of hazardous wastes. Updates are intended as information only and are not meant to be the definitive interpretation of any of the Acts or Regulations regulating hazardous waste. For compliance issues the applicable Acts and Regulations must always be consulted