

Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

JeffKottkamp Lt. Governor

Michael W. Sole Secretary

December 11, 2009

Kathleen Cowger U S Bulk Transport Inc 205 Pennbriar Dr Erie, PA 16509-6650

Re: Florida Hazardous Waste Transporter Approval

Dear Kathleen Cowger:

Your Florida Hazardous Waste Transporter Approval Certificate is enclosed. The terms and conditions of approval are specified in Sections 62-730.170 and 62-730.171, Florida Administrative Code(FAC), a copy of which is enclosed for your reference. Please note the following.

- You must demonstrate proof of liability coverage on an annual basis, even if your insurance policy is issued on a multi-year basis. If no changes in status or insurance coverage have occured, you can meet this requirement by submitting a certificate of liability coverage form along with the two copies of the Hazardous Waste Transporter Status Form, copies of which are available upon request from the Department of Environmental Protection.
- 2. A copy of your insurance policy, together with any endorsements, must be maintained at your principal place of business.
- 3. Your insurer can not terminate your coverage until 30 days after filing written notice with DEP, by Certified mail, that your policy has expired or has been canceled.
- 4. Any changes to the information specified on your approval certificate will render it null and void. It is your responsibility to advise DEP of any changes in liability coverage or status.
- 5. A copy of Hazardous Waste Transporter Status Form, complete with the Department approval shall be carried in each vehicle transporting hazardous waste for the transportation company.

Kathleen Cowger December 11, 2009 Page Two

If you intend to operate a hazardous waste transfer facility, please refer to Form 8700-12FL, page 2, item 7(e) for a list of all the required documents that must be submitted.

If you are currently operating an authorized transfer facility, you must maintain records of incoming and outgoing hazardous waste shipments. These records must include generator names and manifest numbers, and, unless otherwise approved by the Department, must be maintained at the transfer facility in accordance with Rule 62-730.171, 7(6), F.A.C. Also, please review the attached letter of March 11, 2009 addressed to all hazardous waste transporters who have notified of existing transfer facilities, subject: Required Submittal of Supplemental Information.

If you have any questions, please contact me at 850/245-8755.

Sincerely,

Aprilia Siaves

Aprilia Graves Engineering Specialist IV Hazardous Waste Regulation Section

RN

Enclosures: Hazardous Waste Transporter Approval Certificate Hazardous Waste Transporter Status Form (with insurance verification) Sections <u>62-730.170</u> and <u>62-730.171</u>, FAC



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This is to certify that the carrier specified below has been approved as a hazardous waste transporter in Florida. The terms and conditions of this certificate require that the holder comply with all applicable portions of Chapter 62-730, Florida Administrative Code. This certificate shall be rendered null and void if any information contained within becomes obsolete. The certificate shall remain valid through the expiration date specified below.

TRANSPORTER:	U S Bulk Transport Inc
FACILITY ID NO:	PAD987347515
FACILITY ADDRESS:	205 PENNBRIAR DR ERIE, PA 16509
INSURANCE CARRIER:	STEADFAST INSURANCE
INSURANCE POLICY#:	SEO3876352-08
EFFECTIVE DATE:	December 03, 2009
EXPIRATION DATE:	December 03, 2010
APPROVED TRANSFER	FACILITY: NO
APPROVAL ISSUED BY	2: Aprilia Graves
	Engineering Specialist IV
	Hazardous Waste Regulation Section
	850/245-8755

rev.0(Oct 91)

Are your services commercially available? YES

STATE OF FLORIDA

HAZARDOUS WASTE TRANSPORTER STATUS FORM

1.	Transporter Identification:
	Transporter Name: U.S. BULK TRANSPORT, INC. Transporter EPA ID: PAD 987 347 515
	Location Address: 205PENNBRIAR DRIVE
	ERIE PA 16509
Contac	t: <u>KATHLEEN COWGER</u> Telephone: <u>814–824–9949</u>
Mailing	Address: <u>205 PENNBRIAR DRIVE</u> ERIE PA 16509
II.	Insurance Information: Insurance Company STEADFAST INSURANCE COMPANY
	Insurance Company STEADFAST INSURANCE COMPANY Address 2501 W 12TH STREET, YORKTOWN CENTER #9
	ERIE PA 16505
	Contact: JAMIE HEYNES Telephone: 814-452-6881
	Policy Number: SFO3876352-08 Expiration date: 12/03/2010
	Expiration date. <u>12/03/2010</u>
111.	Waste Information:
	EPA Waste Codes for Waste Routinely or Usually Transported:
	D001 D002 D003 D008
	Comments:
IV.	Certification:
ofmul	I certify under penalty of law that the above information is true, correct, and complete to the bes knowledge.
•	
	ILEEN F COWGER PERMIT MANAGER
Print/T	ype Name Title
	11/17/2009
Signat	
*******	***************************************
V.	The transporter identified above is in compliance with the financial responsibility requirements
	ardous waste transporters pursuant to Chapter 62-730.170, Florida Administrative Code. The submitted by the transporter show compliance with the financial responsibility
TOTHS	SUDMINED OV THE ITANSOCHEL SNOW COMDITANCE WITH THE INTRACTAL LESDONSIDIIUV

through <u>12/3/2010</u> Date

APPROVED by Tiffaney A. Noland, changes approved by the Certifier by phone 12/11/2009 Signature of Florida Department of Environmental Protection Representative Date Signed

DEP Form 62-730.900(5)(d) Effective 1/5/95

HW Transporter Status Form Page 1 of 1

Initials Date

	4								
FLORIDA EPA ID PA D 1. Reason for	RE DEP V	 2FL - FLORIDA NOT 2GULATED WASTE Vaste Management Division Blair Stone Rd. Tallahassee (850) 245-8772 7 5 1 5 7 5 1 5 To provide initial n 	ACTIVITY -HWRS, MS4560 e, FL 32399-2400		Date Re (for FDEP Offi RCRAI	cial Use Only) nfo			
Submittal	correct box:	correct box: waste, universal waste, or used oil activities). Image: Subsequent notification information). Is this the final notification (see instructions) for the facility?							
2. Facility or Business Name		S. BULK TRANSPO	RT, INC.	2	D No. 5 1 6 6	and ball and the second second second			
3. Facility Operator (List additional Operators in the	U.S.	BULK TRANSPORT	, INC.		e Operator: mi	// m dd yy			
comments section).	Street or P.O. Box	205 PENN	BRIAR DRIVE	Pho	ne Number: 8	314-824-9949			
	City or Town:	ERIE		State: PA	Zip Code:	16509			
	Operator Type:		Municipal	State 🗙 Oth	erFORHIRE	TRANSPORTER			
4. Facility Physical Location	Physical Street Address: 205 PENNBRIAR DRIVE								
Information	City or Town:	ERIE		State: PA	Zip Code:	16509			
	^{County:} Choose		lf available, ple boundaries.	ase attach a m	ap or sketch o	f the facility			
	Latitude: d d	Longi mms_s.ssss	dd mm	s s . ssss	Method: Datum:				
5. Facility North Am Classification Syst		^{A.} 484		В					
Code(s)		С.		D.	a a a a a a a a a a a a a a a a a a a				
6. Facility or Business Mailing	Street Address or	P.O. Box:	205 PEN	NBRIAR D	12				
Address	City or Town:	ERIE	ayan banan bu kata di kata di kata da kata yang da kata da yang da kata da kata da kata da kata da kata da kat	State: PA	Zip Code:	16509			
7. Facility or Business Contact	First Name:	KATHLEEN	Last Name: C	OWGER	Title: PEF	RMIT MGR			
Person	Phone Number:	814-824-9949	Extension: 101	E-Mail: KCC	WGER@USB RT.CC	ULKTRANSPO			
	Street or P.O. Box: 205 PENNBR								
· .	City or Town:	ERIE		State: PA	Zip Code:	16509			
8. Real Property (Land) Owner of the Facility's	U.S	perty (Land) Owner: B. BULK TRANSPOR	T, INC.		e Owner:/ mm	dd yy			
Physical Location (List additional	Street or P.O. Box	205 PENNE	BRIAR DRIVE	Pho	ne Number: 8	14-824-9949			
real property owners in the comments	City or Town:	ERIE		State: PA	Zip Code:	16509			
section.)	Owner Type:	Private Federal	Municipal Sta	te 🛛 Other	FOR HIRE T	RANSPORTER			

	EPA ID No. PAD987347515
9. Type of Regulated Waste Activity (Mark 'X' in all that	at apply):
 A. Hazardous Waste Activities: (1) Generator of Hazardous Waste (Choose only one of the following three categories.) □ a. Large Quantity Generator (LQG): Generates in any calendar month 1,000 kilograms or greater per month (kg/mo) (2,200 lbs.) of <i>non-acute</i> hazardous waste; or Greater than 1 kg (2.2 lbs) of <i>acute</i> hazardous waste 	 For Items 2 through 7, mark 'X' in all that apply. (2) Treater, Storer, or Disposer of Hazardous Waste (at your facility) Note: A hazardous waste permit may be required for this activity. a. Operating Commercial TSD b. Operating Non-commercial TSD c. Non-operating: Postclosure or Corrective Action Permit or Consent Order (HSWA, etc.)
 b. Small Quantity Generator (SQG): Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of <i>non-acute</i> hazardous waste and/or 1 kg (2.2 lbs) or less of <i>acute</i> hazardous waste 	 (3) Recycler of Hazardous Waste (at your facility) Specify: Commercial; Non-Commercial. A permit is required for storage prior to recycling. (4) Exempt Boiler and/or Industrial Furnace a. Small Quantity On-site Burner Exemption b. Smelting, Melting, and Refining Furnace Exemption
 c. Conditionally Exempt SQG (CESQG): Generates in any calendar month 100 kg/mo or less (220 lbs.) of <i>non-acute</i> hazardous waste and 1 kg (2.2 lbs) or less of <i>acute</i> hazardous waste 	(5) Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities - Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.
 In addition, indicate other generator activities that apply. d. United States Importer of hazardous waste e. Mixed Waste (hazardous and radioactive) Generator 	 (6) Underground Injection Control - Mark an 'X' even if the UIC well at your facility does not receive hazardous waste.
	waste only 🗵 b. For commercial purposes
Contact JAMIE HEYNES Policy Number SEO 3876352 d. Transportation Mode Air Rail X Highway	Telephone 814-452-6881 Expiration date 12/03/2010
e. Hazardous Waste Transfer Facility:	Storage Volume
The following items are required to be submitted w Florida Administrative Code (F.A.C.)]: Certification by a responsible corporate officer of criteria of Section 403.7211(2), Florida Statutes Evidence of the transporter's financial responsibili	ty [Rule 62-730.171(3)(a)3., F.A.C.]
 A brief general description of the transfer facility of A copy of the facility closure plan [Rule 62-730.1] A copy of the contingency and emergency plan [R A map or maps of the transfer facility [Rule 62-73 Notification of changes in above items Annual update notification 	71(3)(a)5., F.A.C.] ule 62-730.171(3)(a)6., F.A.C.]

	EPA ID No. PAD987347515
B. Universal Waste (UW) Activities (Mark 'X' in all that apply) ("accumulated" means at any one time):
Large Quantity Handler (LQH) = $5,000 \text{ kg} (11,000 \text{ lb})$ or more	of any combination of UW accumulated
Small Quantity Handler (SQH) = always less than 5,000 kg accu	
Mercury-containing devices LQH = 100 kg (220 lb) or more ac	cumulated by for-hire handler
Mercury-containing devices SQH = less than 100 kg accumulate	-
Mercury-containing lamps LQH = 2,000 kg (4400 lbs/8,000 lam	
Mercury-containing lamps SQH = less than 2,000 kg (8,000 lam	nps) accumulated by for-hire handler
[Note: $4 \text{ lamps} = 1 \text{ kg}, 62-737.200(10)$]	
Pharmaceuticals LQH = 5,000 kg or more of universal pharmac	eutical waste (UPW) accumulated
Pharmaceuticals LQH = more than 1 kg (2.2 lb) of acutely hazar	rdous ("P-listed") pharmaceutical waste accumulated
Pharmaceuticals SQH = always less than 5,000 kg of UPW and	always 1 kg or less of acutely hazardous UPW accumulated
(1) For those Managing Generate/ Accumulate Generate/ Accumulate Transport (see note in instructions) Handle at Transfer Facility	(2) Enter your esitmate of the maximum amount (in pounds) of each type of UW on site or transported at any one time.
a. Batteries	
b. Pesticides	
c. Pharmaceuticals	
d. Mercury Containing Devices	
e. Mercury Containing Lamps	
(3) Mercury Recovery and/or Reclamation Facility [Chapter 62-737, F.A.C.]	Note: A hazardous waste permit is required for this activity. [Rule 62-737.800, F.A.C.]
(4) Reverse Distributor of UW Pharmaceuticals	Lamps Devices
(5) Destination Facility for UW	ity, a facility must treat, dispose or recycle a UW. A permit is required for ycling.
C. Used Oil Activities:	8) Specific Certification to be signed by all Used Oil Transporters
(1) Used Oil Transporter - indicate type(s) of activity(ies):	I certify as a Used Oil Transporter that the training program and financial
a. Transporter	responsibility required under Section 62-710.600, F.A.C., are in place, current and being adhered to. If any modifications have been made to the
b. Transfer Facility	orginally approved training program, they are explained in attachments to
(2) Collection Center	this registration form. Evidence of financial responsibility is
(3) Used Oil Processor (A permit is required for this activity.)	demonstrated by the attached Used Oil Transporter Certificate of
 (4) Off-Specification Used Oil Burner (5) Used Oil Fuel Marketer 	Liability Insurance, DEP form 62-710.901(4), F.A.C.
(5) Used Oil Fuel Marketer (6) Used Oil Filter	
a. Transporter	· · · · · · · · · · · · · · · · · · ·
b. Transfer Facility	Signature of Authorized Person
c. Processor	
d. End User	Print Name of Authorized Person
(7) Used Oil Transporters, Transfer Facilities, Collection Centers, Off-	
Specification Burners and Marketers must pay an annual \$100	
registration fee. Used Oil Processors are exempt from this fee. If	(9) The records required under the provisions of Rule 62-710.510,
applicable, enclose a check or money order, in the amount of \$100,	F.A.C., are kept at (check one):
payable to Florida Department of Environmental Protection.	Our mailing (business) address
A check is enclosed.	The site (facility) address

				EPA ID No.	PA	D987347515
D. Other State	Regulated Waste	Activities:		Contact Water (P		Chapter 62-740, F.A.C.] red for this activity.
your facility. L	ist them in the orde	y Regulated Haza r they are presented odes routinely or use	in the regulations (e	.g., D001, D003,	F007, U112).	hazardous wastes handled at ces are needed.
[/] D001	² D002	³ D003	⁴ D008	5	6	7
	9	10	11	12	13	14
5	16	17	18	19	20	21
2	23	24	25	26	27	28
1. Other Sta	utus Changes (M	ark 'X' in all that a	ipply):			an analysingan a anglana a analysina a
□ (3) 0 B. Facility C □ (1) C	ther (explain) losed losed at this location one handling regulated	ed waste there.	ving to another - su	bmit a new Form	8700-12FL for t	he new location if you will contact person, mailing
а	ddress, and phone i	umber where you c	an be reached after	closing.		· · · · · · · · · · · · · · · · · · ·
Addr	ess		····	·····		
С. Р	roperty Tax Defai	ılt	D. Petition	for Bankruptcy	Protection	
n accordance w nformation sub for submitting f facility, I am aw	ith a system design mitted is, to the bes alse information, in vare that transfer fac	ed to assure that qua t of my knowledge a cluding the possibili cilities must comply	lified personnel pro and belief, true, accu ty of fine and impri with the requirement	perly gather and e arate, and complet sonment for know	evaluate the info e. I am aware the ing violations.	der my direction or supervisio rmation submitted. The at there are significant penalt If I have notified as a transfer Rule 62-730.182, FAC.
Signature of	- -	, or an authorized e	ר ד ו בי די	int Name and '	ſitle	Date Signed (mm-dd-yyyy)
	representativ					
Ma	representativ M Hovdu		G	ARY GOODE	LLE	11/27/2009
Ma	Manut		G	ARY GOODE	LLE	11/27/2009
Ma	Manut		G	ARY GOODE	LLE	11/27/2009
If the person v	ny Goode	urm is not the Facili		rator, please com	plete the inform	
If the person v	vho filled in this for	u orm is not the Facili VGER	ty Contact or Ope	rator, please com	plete the inform	nation below: sbulktransport.com
If the person v KA	who filled in this for THLEEN COV	u orm is not the Facili VGER	ty Contact or Ope 814-824-9	rator, please com	plete the inform kcowger@u	nation below: sbulktransport.com
If the person v KA	who filled in this for THLEEN COV	u orm is not the Facili VGER	ty Contact or Ope 814-824-9	rator, please com	plete the inform kcowger@u	nation below: sbulktransport.com
If the person v KA	who filled in this for THLEEN COV	u orm is not the Facili VGER	ty Contact or Ope 814-824-9	rator, please com	plete the inform kcowger@u	nation below: sbulktransport.com
If the person v	who filled in this for THLEEN COV	u orm is not the Facili VGER	ty Contact or Ope 814-824-9	rator, please com	plete the inform kcowger@u	nation below: sbulktransport.com
If the person v KA (Name of perso	who filled in this for THLEEN COV	u orm is not the Facili VGER	ty Contact or Ope 814-824-9	rator, please com	plete the inform kcowger@u	nation below: sbulktransport.com

NOV. 25. 2009 12:33PI	NOV.	25.	2009	12:	33PN
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ENDORSEMENT FOR MOTOR CARRIER POLICIES OF INSURANCE FOR PUBLIC LIABILITY

NO. 7883 P. 3

Form Approved OMB No. 2125-0074

UNDER SECTIONS 29 AND 30 OF T	IE MOTOR CARRIER ACT OF 1980
Issued to U.S. BULK TRANSPORT. INC.	of 205 PENNBRIAR DR., ERIE PA 18509
Dated at 1818 MARKET STREET, PHILA PA this this this	day of <u>NOVEMBER</u> 2009
Amending Policy No. SEO 3876352-08	Effective Date12/03/2009
Name of Insurance CompanySTEADFAST INSURANCE COMP	ANY Jungoh 7. Hallings worth
Telephone Number (215)979-6870	Countersigned by Authorized Company Representative
The policy to which this endorsement is attached provides primary of	pr excess insurance, as indicated by "X", for the limits shown:
	e for amounts in excess of \$ for each accident.************************************
	le for amounts in excess of \$ <u>7,000,000</u> for each accident in second accident in second accident in second accident.
Whenever required by the Federal Highway Administration (FHW, agrees to furnish the FHWA or the ICC a duplicate of said policy an request by an authorized representative of the FHWA or the ICC, to	d all its endorsements. The company also agrees, upon telephone
Cancellation of this endorsement may be effected by the company the other party (said 35 days notice to commence from the date notice), and (2) if the insured is subject to the ICC's jurisdiction, by commence from the date the notice is received by the ICC at its offi	the notice is mailed, proof of mailing shall be sufficient proof of providing thirty (30) days notice to the ICC (said 30 days notice to ce in Washington, D.C.).
DEFINITIONS AS USED I ACCIDENT includes continuous or repeated exposure to	loss, damage, or destruction of natural resources arising out of
conditions which results in bodily injury, property damage, or environmental damage which the insured neither expected nor intended. MOTOR VEHICLE means a land vehicle, machine, truck, tractor,	the accidental discharge, dispersal, release or escape into or upon the land, atmosphere, watercourse, or body of water, of any commodity transported by a motor carrier. This shall include the cost of removal and the cost of necessary measures taken to minimize or mitigate damage to human health, the natural
trailer, or semitrailer propelled or drawn by mechanical power and used on a highway for transporting property, or any combination thereof.	environment, fish, shellfish, and wildlife
BODILY INJURY means injury to the body, sickness, or disease	PROPERTY DAMAGE means damage to or loss of use of tangible property.
to any person, including death resulting from any of these, ENVIRONMENTAL RESTORATION means restitution for the	PUBLIC LIABILITY means liability for bodily injury, property damage, and environmental restoration.
The insurance policy to which this endorsement is attached provides automobile liability insurance and is amended to assure compliance by the insured, within the limits stated herein, as a motor carrier of property, with Sections 29 and 30 of the Motor Carrier Act of 1980 and the rules and regulations of the Federal Highway Administration (FHWA) and the Interstate Commerce Commission (ICC).	endorsement thereon, or violation thereof, shall relieve the company from liability or from the payment of any final judgment, within the limits of liability herein described, irrespective of the financial condition, insolvency or bankruptcy of the insured. However, all terms, conditions and limitations in the policy to which the endorsement is attached shall remain in full force and effect as binding between the insured and the
In consideration of the premium stated in the policy to which this endorsement is attached, the insurer (the company) agrees to pay, within the limits of liability described herein, any final judgment recovered against the insured for public liability resulting from negligence in the operation, maintenance or use of motor vehicles subject to the financial responsibility requirements	company. The insured agrees to reimburse the company for any payment made by the company on account of any accident, claim, or suit involving a breach of the terms of the policy, and for any payment that the company would not have been obligated to make under the provisions of the policy except for the agreement contained in this endorsement.
of Sections 29 and 30 of the Motor Carrier Act of 1980 regardless of whether or not each motor vehicle is specifically described in the policy and whether or not such negligence occurs on any route or in any territory authorized to be served by the insured or elsewhere. Such insurance as is afforded, for public liability,	It is further understood and agreed that, upon failure of the company to pay any final judgment recovered against the insured as provided herein, the judgment creditor may maintain an action in any court of competent jurisdiction against the company to compel such payment.
does not apply to injury to or death of the insured's employees while engaged in the course of their employment, or property transported by the insured, designated as cargo. It is understood and agreed that no condition, provision, stipulation, or limitation contained in the policy, this endorsement, or any other	The limits of the company's liability for the amounts prescribed in this endorsement apply separately, to each accident, and any payment under the policy because of any one accident shall not operate to reduce the liability of the company for the payment of final judgments resulting from any other accident.
The Motor Carrier Act of 1980 requires limits of financial responsi by the motor carrier. It is the MOTOR CARRIER'S obligation to obl	bility according to the type of carriage and commodity transported ain the required limits of financial responsibility.

THE SCHEDULE OF LIMITS SHOWN ON THE NEXT PAGE DOES NOT PROVIDE COVERAGE.

The limits shown in the schedule are for information purposes only.

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NOV. 25. 2009 12:33PM

SCHEDULE OF LIMITS Public Liability

NO. 7883 P. 4

Type of Carriage		Commodity Transported	Minimum Insurance				
(1)	For-hire (In interstate or foreign commerce).	Property (nonhazardous).	\$. ³		ر.	750,000	
	For-hire and Private (in interstate, foreign, or intrastate commerce).	Hazardous substances, as defined in 49 CFR 171.8, transported in cargo tanks, portable tanks, or hopper- type vehicles with capacities in excess of 3,500 water gallons; or in bulk Divisions 1.1, 1.2, and 1.3 materials; any quantity of Division 2.3 Hazard Zone A or Division 6.1, Packing Group 1, Hazard Zone A material; in bulk Division 2.1 or 2.2; or highway route controlled quantities of a Class 7 material as defined in 49 CFR 173.403.				5,000,000	
(3)	For-hire and Private (In interstate or foreign commerce: in any quantity) or (In intrastate com- merce; in bulk only).	Oil listed in 49 CFR 172.101, hazardous materials and hazardous substances defined in 49 CFR 171.8 and listed in 49 CFR 172.101, but not mentioned in (2) above or (4) below.				1,000,000	
(4)	For-hire and Private (in interstate or foreign commerce).	Any quantity of Division 1.1, 1.2 or 1.3 material; any quantity of a Division 2.3, Hazard Zone A, or Division 6.1, Packing Group 1, Hazard Zone A material; or highway route controlled quantities of Class 7 material as defined in 49 CFR 173.403.				5,000,000	

Note: The type of carriage listed under (1), (2), and (3) applies to vehicles with a gross vehicle weight rating of 10,000 pounds or more. The type of carriage listed under number (4) applies to all vehicles with a gross vehicle weight rating of less than 10,000 pounds.

SCHEDULE OF LIMITS Public Liability

For-hire motor carriers of passengers operating in interstate or foreign commerce

Vehicle Seating Capacity	Minimum Insurance			
(1) Any vehicle with a seating capacity of 16 passengers or more.	\$	5,000,000		
(2) Any vehicle with a seating capacity of 15 passengers or less.		1,500,000		