



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
79 Elm Street
Hartford, CT 06106-5127

Environmental Program Fact Sheet

HAZARDOUS WASTE CONTAINER MANAGEMENT

Purpose

This fact sheet is designed to answer general questions and provide basic information on hazardous waste container management, and is not intended to supersede the applicable regulations. The information provided below addresses the requirements applicable only to large quantity generators (LQG) and small quantity generators (SQG). The hazardous waste container management requirements are found in Section 22a-449(c)-102(a)(1) of the Regulations of Connecticut State Agencies ("RCSA"), incorporating Subpart C of 40 CFR 262, Subpart I of 40 CFR 265 and 40 CFR 264.175. It is your responsibility to comply with all applicable laws and regulations.

What is a Hazardous Waste Container?

40 CFR 260.10

Containers are **portable** devices used for collecting, storing, treating and transporting hazardous waste. They can be of any size which, generally, can be easily moved. Some common examples include: five-gallon safety cans, 55- gallon drums and 30- cubic yard roll-offs.

How Long Can I Keep Containers On-site?

40 CFR 262.34(a)

Allowable storage limits vary depending on your category of waste generation (i.e. LQG, SQG). If you are an LQG, you have 90 days to ship that waste off-site. If you are an SQG, you have 180 days (or 270 days if you ship the waste greater than 200 miles).

When Does the Time Limit Begin?

40 CFR 262.34(a)(2)

The time limit begins when the first drop of waste is placed in the container. If the waste is collected in **satellite accumulation containers**, the time frame starts after the containers are filled.

What are Satellite Containers?

40 CFR 262.34(c)(1)

Satellite containers are containers placed at or near the process that generates the waste. They are used for the routine/repetitive collection of waste from a specific process, such as a production spray paint booth where waste paint and thinners are continually generated, and are subject to reduced requirements .

What are the Reduced Satellite Container Requirements?

40 CFR 262.34(c)(1)

The containers must be located where the waste is generated and under control of the process operator. The containers must be labeled with the words "hazardous waste" and a description of the waste, such as the chemical name. The containers must remain closed except when adding or removing waste. The containers cannot exceed 55 gallons, or one quart of acutely hazardous waste listed in 40 CFR 261.33(e). Once full, the containers must be moved to a container storage area within 72 hours. The full containers are subject to all of the container management requirements. *If you are shipping the hazardous waste in the same accumulation container, refer to the Pre-Transport Requirements on the last page.*

What are the Container Management Requirements?

40 CFR 262.34

40 CFR 265.170-177

40 CFR 265.15

Containers must be labeled with the words "hazardous waste" and a description of the waste, such as the chemical name. Containers must be marked with the date of accumulation (date waste was first placed in the container). For satellite containers, the date of accumulation begins when the 55 gallon volume limit, or one quart volume limit for acutely hazardous waste, is exceeded. Containers must be closed, except when adding or removing waste. *A hazardous waste marker described in the Pre-Transport Requirements section will meet the labeling requirements above.*

Container storage areas must be inspected for signs of leakage, corrosion, deterioration, etc. Inspections must be conducted at least weekly and each time waste is added to, or removed from the area. Reactive and ignitable waste must be stored at least 50 feet from the property line.

Containers must be compatible with the waste, and cannot contain residue which might be incompatible with the waste being stored. Examples of compatible containers for some waste types are nitric acid in stainless steel, and flammable liquids in steel containers.

Do not place containers near incompatible materials or wastes unless they are separated by a berm, dike, wall or other suitable device.

What are the Requirements for Areas Where Containers are Stored?

40 CFR 265.30-37

40 CFR 264.175

The waste must be stored in areas that provide secondary containment to prevent run-off of accumulated liquids. The base of the area must be impervious to the type of waste stored and free from cracks, gaps, chips, etc. Secondary containment systems must be able to contain the volume of the largest container or 10% of the volume of all containers in storage, whichever is greater.

The area must be designed to prevent liquids from coming in contact with the containers. Sloping the base to drain liquids away from the containers, or placing the containers on raised platforms (pallets) may accomplish this. Liquid in the containment system must be removed as soon as possible and tested to determine if it is hazardous. It is recommended that outdoor storage areas be covered (roofed) to prevent rain accumulation.

Storage areas must be designed to prevent run-on (rain water, flooding, etc), or have excess containment capacity to contain the run-on, in excess of the containment volume noted above

Adequate aisle space must be maintained around the containers to allow unobstructed movement of personnel and emergency response equipment. A minimum of 30 inch aisle space is recommended.

Emergency response equipment which is suited to the types of waste generated must be maintained, in good working condition. Some examples include fire extinguishers, absorbents, non-sparking shovels, overpack containers and personal protective equipment. There must be a communications system nearby which can be used to summon help in the event of an emergency. This could be a telephone, radio, alarm system, etc.

What are the Pre-Transport Requirements for Shipping Hazardous Waste?
40 CFR 262.30 - 33

The pre-transport requirements include the U.S. Department of Transportation (DOT) requirements for preparing containers of hazardous waste for off-site shipment. The pre-transport requirements include:

- Packaging** The hazardous waste must be packaged in containers that meet the requirements of 49 CFR 173, 178 and 179.
- Labeling** Each container must have the proper DOT label specified in 49 CFR 172 (i.e. corrosive, flammable, oxidizer, etc).
- Marking** Each container of 110 gallons or less must be marked in accordance with 49 CFR 172.304, with the following words:

HAZARDOUS WASTE--Federal Law Prohibits Improper Disposal. If found, contact the nearest public safety authority or the Environmental Protection Agency.

Generators name and address: write in the business name and address

Manifest Document Number: write in the manifest number

Containers of hazardous waste must always be labeled with words that describe their contents as well as with the words "hazardous waste".

- Placarding** The generator of the waste is responsible for providing the proper DOT placards to the transporter. The generator must be familiar with the placarding requirements in 49 CFR 172 Subpart F. Most transporters provide their own placards, however it is your responsibility to ensure that the proper placards accompany your shipment.

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NON-HAZARDOUS WASTE

