

## Business Environmental Program Hazardous Waste Fact Sheet

### Put A Lid On It!

Management of hazardous waste in containers is regulated by United States Environmental Protection Agency (EPA) and State of Nevada—Division of Environmental Protection (NDEP) standards, and it is also ruled by common sense. Containers are portable devices used for the storage, transportation, treatment, disposal or handling of materials (40 CFR § 260.10). Examples of containers include, but are not limited to, drums, cans, tote bins, Jugs, and roll-off boxes. The regulation, 40 CFR § 265.173(a), states: *A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.*

The purpose of the closed container requirement is to:

- Minimize emissions of volatile wastes,
- Isolate ignitable or reactive wastes from sources of ignition or reaction,
- Prevent spills,
- Reduce the potential for mixing of incompatible waste,
- Minimize the likelihood of using the hazardous waste container as a trashcan or ashtray,
- Minimize the potential for rainwater to enter the container, increasing both the volume of hazardous waste and the associated handling costs, and
- Reduce the potential for any object to fall into the waste.

Common sense dictates the lids should be secure. Containers are considered adequately closed if:

- No spills or releases occur if the container is knocked over,
- Volatilization does not occur- no odors can be emitted from the container,
- Items dropped on top of the container cannot pass through the container lid and into the waste, or
- Foreign objects and liquids cannot enter the container inadvertently.

Proper lids or closure devices include:

- Screw-on lids,
- Dual-bung drums with both bungs securely in place, and
- Lids securely held in place by rings.

Plastic wrap and aluminum foil coverings are not acceptable means of closure. Objects can fall through these covers and they are not secure. Open funnels in drums are also not adequate lids because the opening allows for volatilization of the chemicals. Funnels with lids in a closed position and screw into the container are acceptable. Spill kits should be located nearby to control releases, in the event of a spill.

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Keeping containers upright is critical to controlling spills and minimizing potential releases. Containers should be stored in low-traffic areas where the container will be knocked over or hit by equipment such as handcarts, forklifts, and trucks, if at all possible. If containers must be stored in high traffic areas, consider securing them to an immobile object. The regulations, 40 CFR 265.173(b)), stipulate: *A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.*

Secondary containment around the base of the container is recommended and sometime required. Fire codes, local utility standards, and insurance policies may require secondary containment. Local authorities will be able to provide businesses with the exact requirement for their facilities. Secondary containment in the form of enclosed tubs or bermed areas can keep spilled waste from entering drains, contaminating soils, creating slip and fall hazards, and costing time and money for cleanup. Containers can greatly reduce the amount of absorbent used to clean up spills and leaks. Containment devices can be purchased or made in-house. The goal of secondary containers is to keep spilled material from becoming a hazard; the devices are useful around containers of both waste and raw material.

In addition to secure lids, EPA and NDEP regulations also require the identification of the contents of the hazardous waste containers. The regulations, 40 CFR §262.34(a)(3) and 40 CFR §262.34(c)(1), stipulate the containers must be labeled with the words "Hazardous Waste" or words identifying the contents (both are recommended). The "accumulation start date" and the EPA waste code (a waste may have more than one EPA waste code) are to be placed on the label when the drum becomes full, and is moved from a satellite hazardous waste storage area to a central hazardous waste storage area. Waste codes can be found in EPA's manual *Notification of Regulated Waste Activity* or 40 CFR§261 Subparts C & D.

Additional information on the waste storage requirements has been presented in the Business Environmental Program's *Satellite Accumulation* and *Inspection of Hazardous Waste Container and Tanks* fact sheets.