

Are You Properly Managing Your Hazardous Waste Containers?

Container Storage Areas and Inspections

The regulations require that you conduct weekly inspections of containers in your storage area and keep an inspection log. The inspection requirements only apply to hazardous waste containers in your central storage area, not to containers in a satellite area.

A weekly inspection occurs seven days after the previous inspection (not Monday of one week and Friday of the next). There is no standardized inspection form that must be used. You can create your own form.

Some important items to consider during the inspection:

- Are containers properly labeled?
- Do containers have accumulation start dates?
- Are containers closed and in good condition (no rust, leaks, etc.)?
- Is adequate aisle space provided between containers?

If you find problems in your storage area, correct them immediately and record your actions in the log. Under the regulations, there is no specific time frame for how long inspection logs need to be kept. It's recommended that you keep several logs to show that you've been conducting inspections. This will



At this company, one drum has a hazardous waste label, but the other does not. Make sure all your drums are labeled.

help prove that you're in compliance, if your business is ever inspected by Ohio EPA.

You must keep equipment and supplies near your storage area to respond to a hazardous waste incident (fire, spill or release). This includes an emergency communication device, fire control and spill control equipment.

Your emergency equipment must be inspected as needed to ensure it operates properly. You must also keep a log of these inspections, however, there is no specific requirement for how long inspection logs need to be kept. Again, it is recommended that you keep a sufficient quantity of logs to show that you've been conducting inspections.

Tips for Your Hazardous Waste Container Storage Area

- Consider restricting access to help avoid accidents.
- Keep waste storage areas away from high traffic areas.
- Mark the area with a sign, so employees know the area is for hazardous waste accumulation only.
- Have adequate spill control equipment near the storage area.
- Have adequate aisle space between containers in your storage area.

Condition of Containers

All hazardous waste containers need to be closed, except when adding or removing waste. To meet the criteria of being "closed," a drum must have all snap rings tightly bolted, bungholes capped and lids secured. It is acceptable for a funnel to be threaded into a bunghole and secured with a lid.



*This company is storing hazardous waste drums outside without containment. Spills on the ground will likely require a costly cleanup. **Don't** do this at your business.*

To help prevent leaks and spills, your containers must be kept in good condition. Make sure your drums are not rusting or damaged. You must also handle containers to prevent damage and leaks. If a container is damaged (e.g., hit by a forklift or other machinery), transfer the contents into another drum.

Under Ohio Administrative Code rule 3745-65-35, you must have adequate aisle space between hazardous waste containers in your storage area. Although there is no specific footage requirement, there must be enough room to move between containers and respond to a hazardous waste incident. Such incidents may include over packing drums, fixing container labels, or responding to a fire or release.

Many business owners ask about technical specifications for containers. Ohio EPA's hazardous waste regulations do not outline the specific type of drum that must be used for different waste streams. There is a general requirement, however, that the container must be compatible with the hazardous waste being stored in it. For example, it's not recommended that you store a corrosive waste such as an acid in a metal drum that could deteriorate.

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There is also a requirement that containers shipped off site meet applicable Department of Transportation (DOT) regulations. You should refer to these requirements for more detailed specifications on containers. For more information on the DOT requirements, contact Ohio's Public Utilities Commission, Hazardous Materials Division at (614) 644-0351.

Under Ohio's regulations, large quantity generators that have reactive or ignitable hazardous waste must store these wastes at least 15 meters (50 feet) from the property line. For more information about ignitable waste storage, you should also contact your local fire department. There may be specific storage requirements for ignitable wastes under your local fire codes.

Containment for Containers

Another common question from businesses relates to secondary containment for hazardous waste drum storage areas. As a generator, you are not required under Ohio's hazardous waste regulations to provide secondary containment for your drum storage area. For other hazardous waste handlers, such as companies pursuing permits for hazardous waste storage or disposal, and for treatment activities, secondary containment for containers is required.

However, although your business may just be generating hazardous waste, it's a good idea to consider secondary containment, especially if you are storing any hazardous waste outside. A simple concrete pad or other containment device can help you contain spills and avoid a costly cleanup.

Although the hazardous waste rules do not require generators to provide secondary containment, other regula-

tions may apply. This could include containment requirements under Ohio's wastewater program or your local sewer ordinance to help prevent spills from entering a sewer system. Contact the Ohio EPA Division of Surface Water or check your local sewer ordinance for additional regulations.

You may also find that local fire codes require containment for materials such as ignitable wastes. Check with your local fire department for more information.



A simple containment structure can help you capture leaks and spills.

Empty Containers

Questions are often raised about when a container which once held hazardous waste would be considered empty. The regulatory definition of a "RCRA empty" container is found in Ohio Administrative Code Rule 3745-51-07.

A container is considered empty if all wastes have been removed, using common practices such as pouring, pumping or aspirating. In addition, the following criteria must be met:

- If the container is less than or equal to 110 gallons in size: no more than one inch of residue remains in the container, or

- No more than 3 percent of residue by weight (of the total capacity of the container) remains in the container.
- If the container is greater than 110 gallons in size: no more than 0.3 percent of residue by weight (of the total capacity of the container remains) remains in the container.

A container that held a hazardous waste compressed gas is empty when the pressure in the container reaches atmospheric pressure. A container which held an acute hazardous waste must be triple rinsed before being considered empty.

Once a container is considered "RCRA empty," it can be managed as a non-hazardous waste. Please note, however, that although the container itself would not be regulated as hazardous waste, any wastewater or rinseate generated from cleaning out containers would need to be evaluated and, if hazardous, properly disposed of.

To Get More Help

If you have any additional questions about managing your hazardous waste, contact your local Ohio EPA District Office, Division of Hazardous Waste Management (DHWM). See map for your local district office. You can also contact DHWM's Regulatory & Information Services Section at (614) 644-2977.

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Glossary

Acute Hazardous Wastes

Acute wastes are very toxic and can be harmful to humans in small amounts. Ohio's regulations include a specific list of acute hazardous wastes, found in Ohio Administrative Code 3745-51-33(E).

Small Quantity Generator (SQG)

Generates between 100-1,000 kg. (220-2,200 pounds) of hazardous waste in a calendar month.

Large Quantity Generator (LQG)

Generates more than 1,000 kg. (2,200 pounds) of hazardous waste in a calendar month, or generates more than 1 kg (2.2 pounds) of acute hazardous waste in a calendar month.

Satellite Accumulation Area

An area where hazardous waste is collected at or near the point where it is initially generated. The satellite area must also be under the control of the process operator where the hazardous waste is generated.

References

1. Ohio EPA, Division of Hazardous Waste Management, Guidance Document on Closed Containers. (www.epa.state.oh.us/dhwm/pdf/Closed_Container_Guidance.pdf)
2. Ohio EPA, Division of Hazardous Waste Management, Satellite Accumulation. (www.epa.state.oh.us/dhwm/pdf/Satellite_Accumulation_Guidance.pdf)
3. Ohio EPA, Answer Place Definition of "weekly" for hazardous waste inspection requirements. (<http://ohioepa.custhelp.com> and search for 428)

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2110 E. Auroa Rd.
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