

Safe Hazardous Waste Container Management

Small quantity generators (SQG) and large quantity generators (LQG) of hazardous waste must comply with container requirements. To EPA (and OSHA) inspectors, container management is like low-hanging fruit– it is very easy to catch and is commonly overlooked by employers.

Container Labeling



With the exception of satellite accumulation containers, all containers holding hazardous waste must be labeled with the following:

- The words “Hazardous Waste + (insert name of *contents/material*) ex. Toluene solvent
- The Accumulation Start Date (date when waste was first placed into the container)
- Associated physical and/or health hazards (per OSHA Hazcom GHS 2012)
- Before shipping waste, add the applicable Waste Code(s) (ex. Ignitable: D001)

Satellite Accumulation Areas

Small amounts of hazardous waste (ex. from process lines, labs, etc.) may be collected at or near the point of generation known as a “satellite accumulation area”. Up to one 55-gallon drum (or appx. 1 qt of acutely hazardous waste) of each individual waste may be stored in the accumulation area. Multiple smaller containers may be used for a single waste stream as long as the aggregate total of that waste stream does **not** exceed 55-gallons. To remain in compliance , ensure that:

- The area is at or near the point where the waste is generated
- The area is under the direct control of a person working in that area
- Each container in the satellite area is marked as “Hazardous Waste + *contents*”
- Containers are always closed, unless adding or removing waste
- Each container is in good condition and compatible with the materials stored in it.

Once you accumulate 55-gallons of waste, the container(s) must be labeled and moved from the satellite area to the main hazardous waste storage area within three days. Now, add the accumulation start date to the waste label and ship it out within the timeframe designated by your facility generator status.

Empty Containers

A container can be considered empty when all wastes have been removed, using practices such as pumping, pouring and/or aspirating. Additionally, the following criteria must be met:

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

Containers which held acute hazardous wastes must be triple-rinsed before they’re considered empty. Washwater from rinsing the container remains acutely hazardous and must be disposed of accordingly. Once a container is considered “RCRA empty”, the container itself may be managed as a non-hazardous waste.