

Hazardous Waste Containers

A container's a container, no matter how small

When you think about a container of [hazardous waste](#), the first thing that comes to mind is usually a 55-gallon drum. But what about a test tube, quart jar, or even a railroad car? The definition at [40 CFR 260.10](#) says a "container" is any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled. According to [EPA](#), the definition is "intentionally broad," to encompass all the different types of portable devices that may be used to handle [hazardous waste](#).

Containers must be in good condition to satisfy the requirements for storing hazardous waste. Waste that is stored in defective containers must be moved to intact containers.

Containers need to be constructed of — or lined with — material that will not react with the waste stored in them. Unwashed containers that previously held a waste cannot be used to store a new waste that would be incompatible with the old one. [Hazardous waste](#) is unsuitable for placement in a container if:

- It could cause corrosion or decay of the container or inner liner, or
- It could commingle with another waste or material under uncontrolled conditions, possibly producing heat, pressure, fire, an explosion, violent reaction, toxic dusts, mists, fumes, or flammable gases. [Appendix V](#) to Parts 264 and 265 list potentially incompatible wastes. But EPA cautions that generators should perform an "adequate analysis" before mixing any wastes to avoid the possibility of a whole host of unwanted reactions.

Containers of [hazardous waste](#) must be labeled with the words "Hazardous Waste" (or other words that identify the contents of the container). In addition, the date upon which each period of accumulation begins must be clearly marked or visible for inspection on each container. Containers must be labeled or marked when the waste is generated.

When asked about labeling containers that are too small to label with the words "Hazardous Waste," [EPA](#) replied that generally, very small containers should be placed in properly labeled larger containers. However, other approaches that would achieve the same results would also be acceptable.

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In addition to the hazardous waste regulations, many other standards address material handling and storage. Examples include:

- [§1910.101](#)— The compressed gas regulation covers the general requirements for the in-plant handling, storage, and use of compressed gases, regardless of content or packaging.
- [§1910.106](#) — Flammable liquids shall be kept in covered containers or tanks when not actually in use. There are limits on the quantity of flammable or combustible liquids that may be located outside of an inside storage room or storage cabinet in any one fire area of a building.
- [§1910.109](#) — No person shall store, handle, or transport explosives or blasting agents when such storage, handling, and transportation of explosives or blasting agents constitutes an undue hazard to life.
- [§1910.110](#) — Storage and handling of liquefied petroleum gases.

For more information, please contact the Chapman University Risk Management / Environmental Health & Safety Office.