



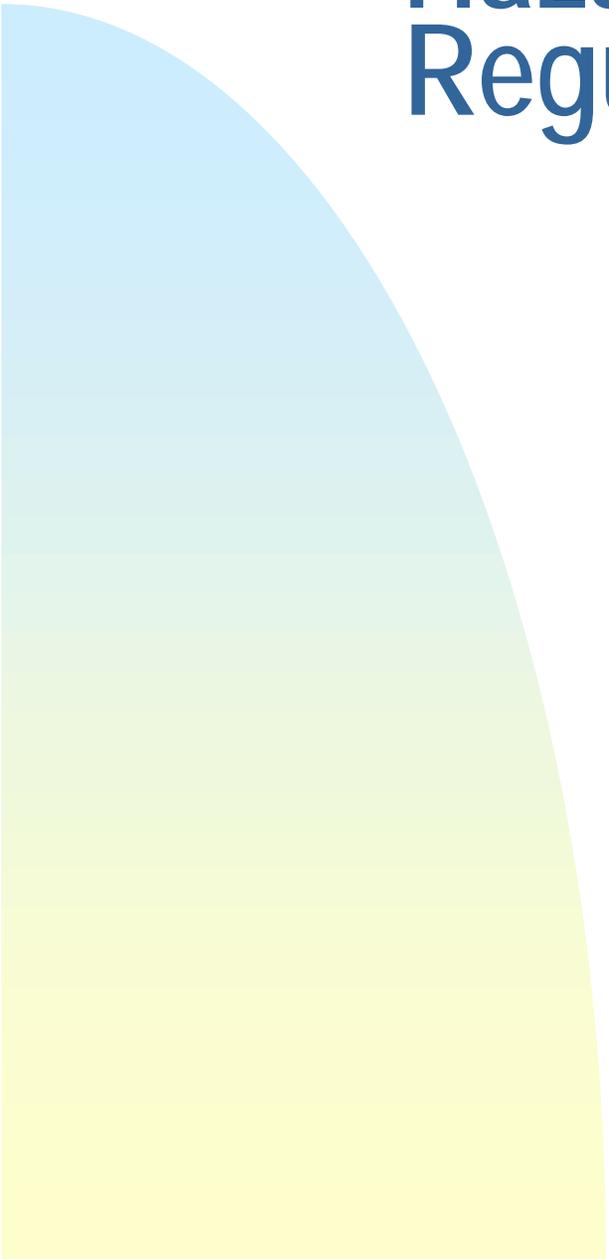
**Missouri  
Department of  
Natural Resources**

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# Container Markings

Patty Chapman

Compliance and Enforcement Section



# Hazardous Waste Regulations

- Require facilities to mark hazardous waste containers
- Missouri regulations differ from federal regulations on when containers are marked

# Federal Rule

- 40 CFR 262.32
- (a) Before transporting or offering hazardous waste for transportation off-site, a generator must mark each package of hazardous waste in accordance with the applicable DOT regulations on hazardous materials under 49 CFR part 172.

# Hazardous Waste Marking

- Words “Hazardous Waste”
- Accumulation start date
- Information required by DOT
- “HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.”

# Hazardous Waste

## FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the Environmental Protection Agency

Accumulation Start Date:

Reportable Quantities (RQ): lbs  
*40 CFR Subchapter J, Part 302, Table 302.4*

Manifest Document #:

Emergency Response Guide #:

EPA Waste Code(s) and/or Characteristic(s)

Generator Name:

Address:

City:

State:

Zip:

EPA ID #:

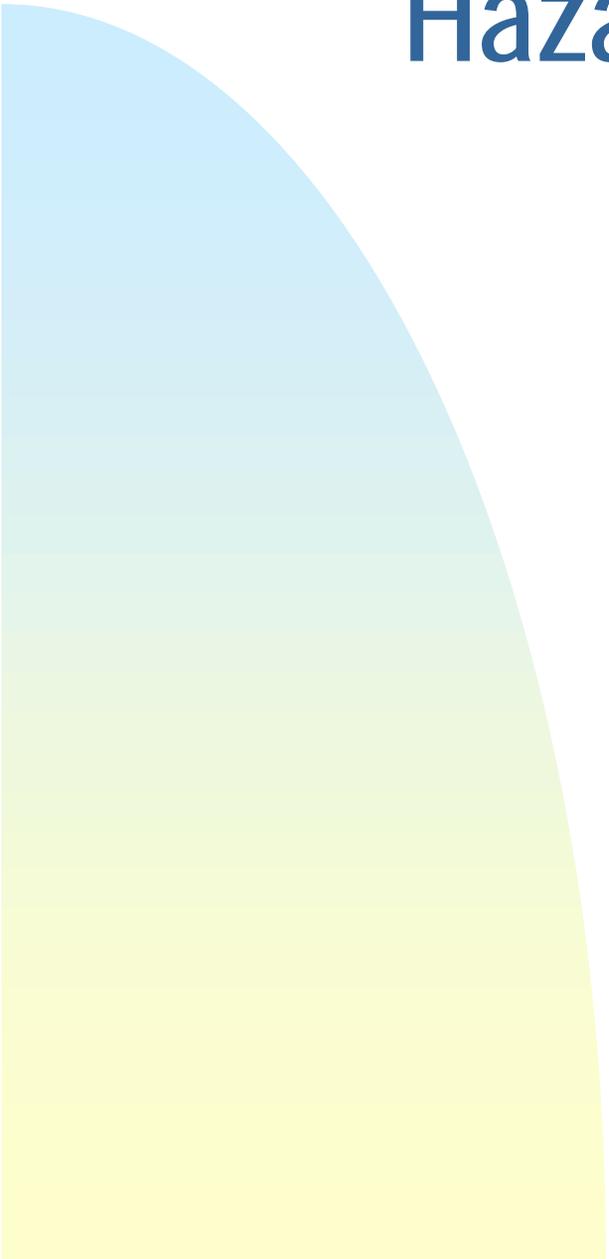
EPA/DOT Shipping Name:

Hazard Class:

UN/NA #:

Packing Group (PG):

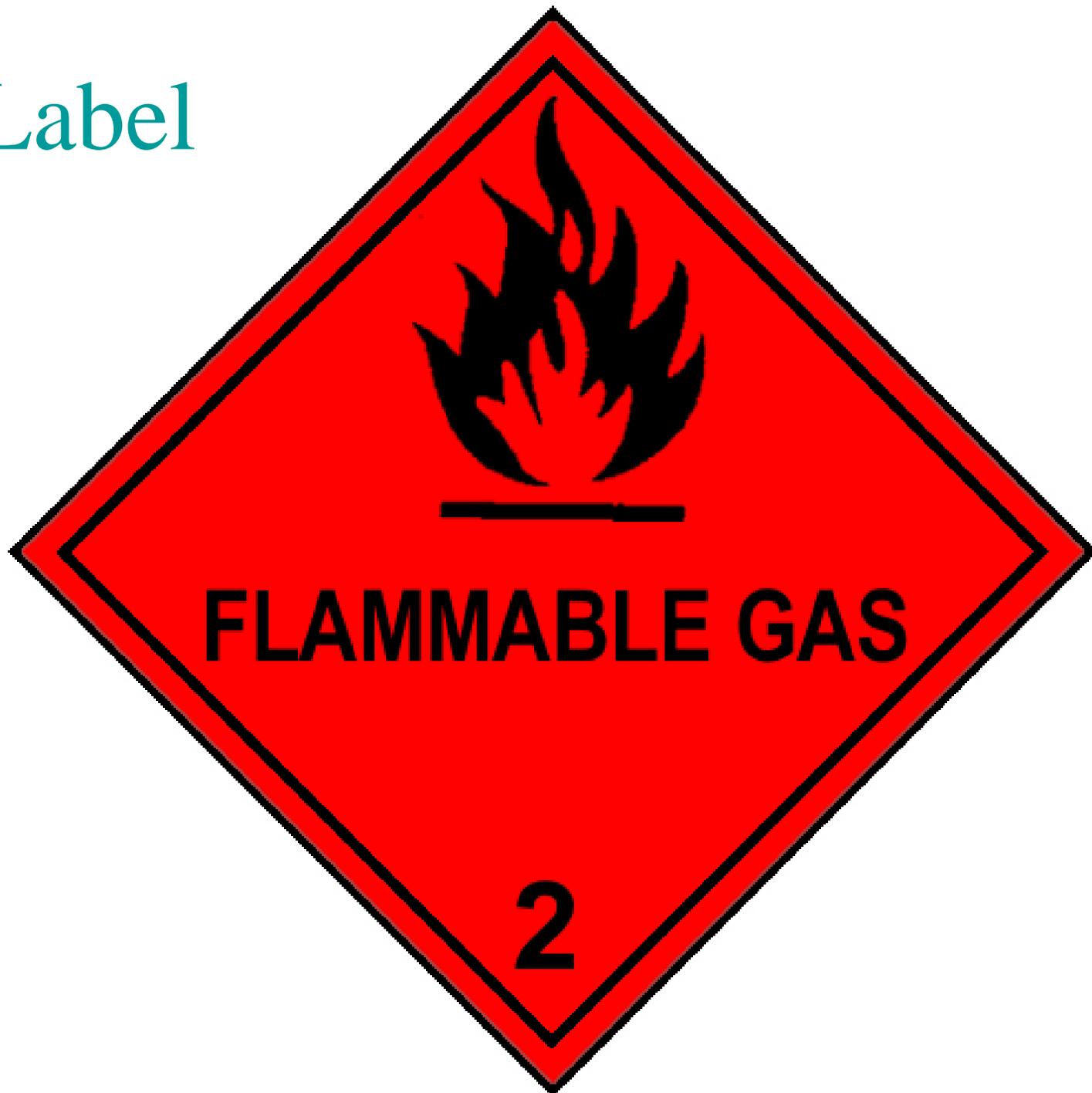
In the event of a spill or release of this hazardous waste, contact the US Coast Guard National Response Center at 1-800-424-8802 for information and assistance.



# Hazardous Waste Label

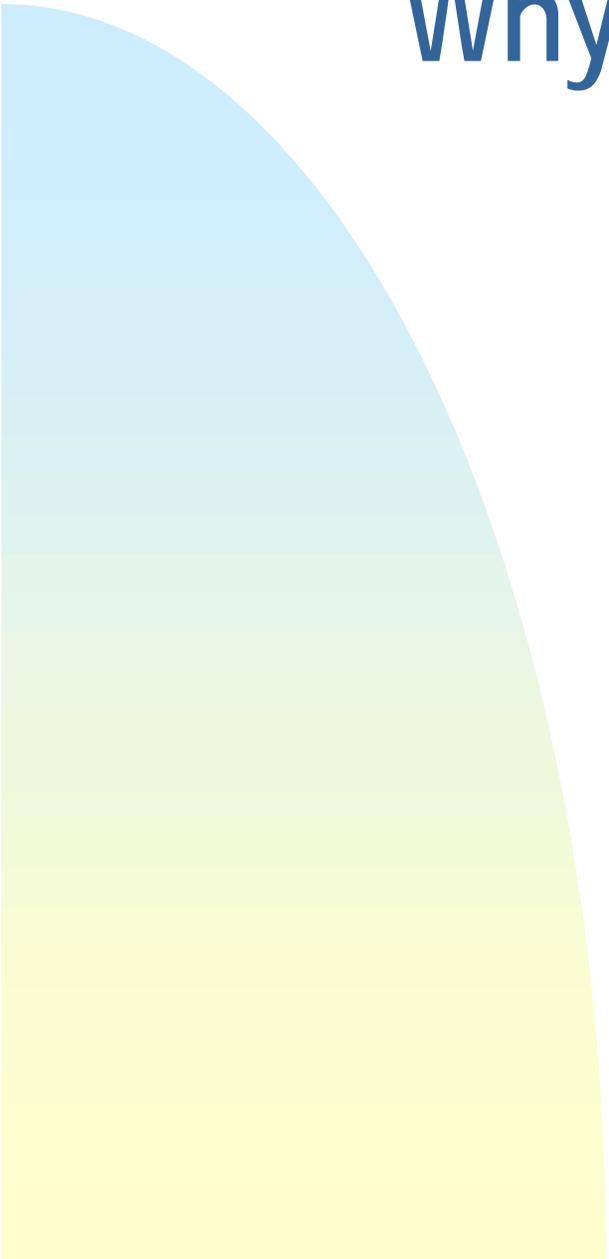
- 40 CFR 262.31
- Before transporting or offering hazardous waste for transportation offsite, a generator must label each package in accordance with the applicable Department of Transportation regulations on hazardous materials under 49 CFR part 172.

Label



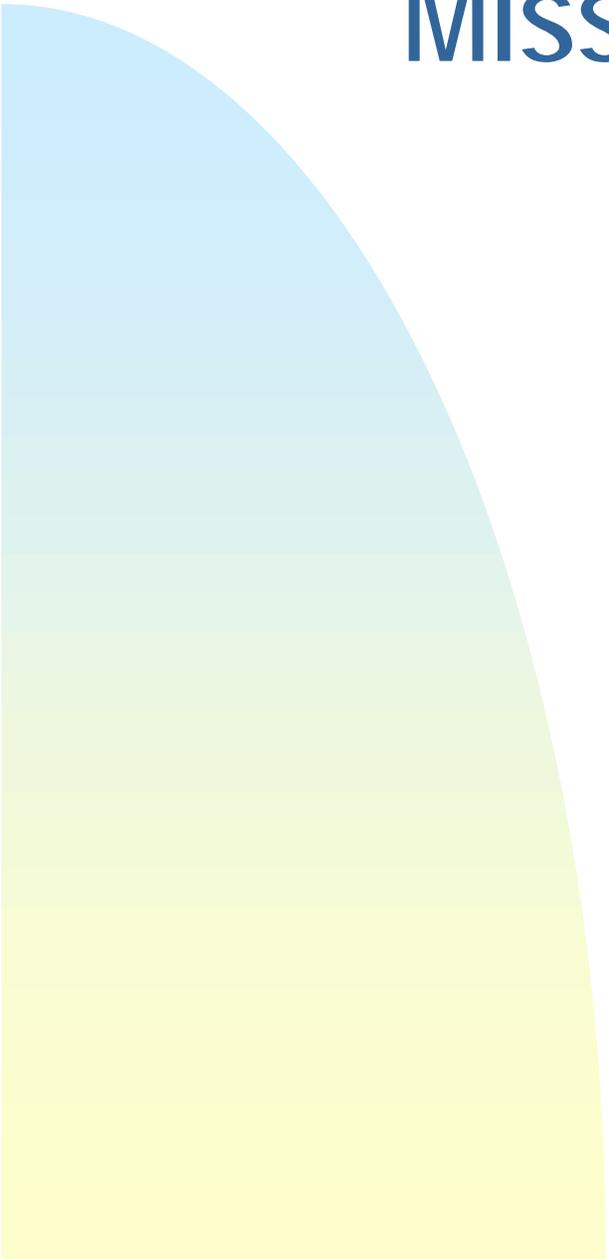
# Missouri Regulation

- 10 CSR 25-5.262(2)(C.)(1)
- During the entire time hazardous waste is accumulated in storage on-site, generators shall package, mark and label hazardous waste containers in compliance with the requirements of 40 CFR 262.32 and 40 CFR part 262 Subpart C as incorporated and modified within these regulations.



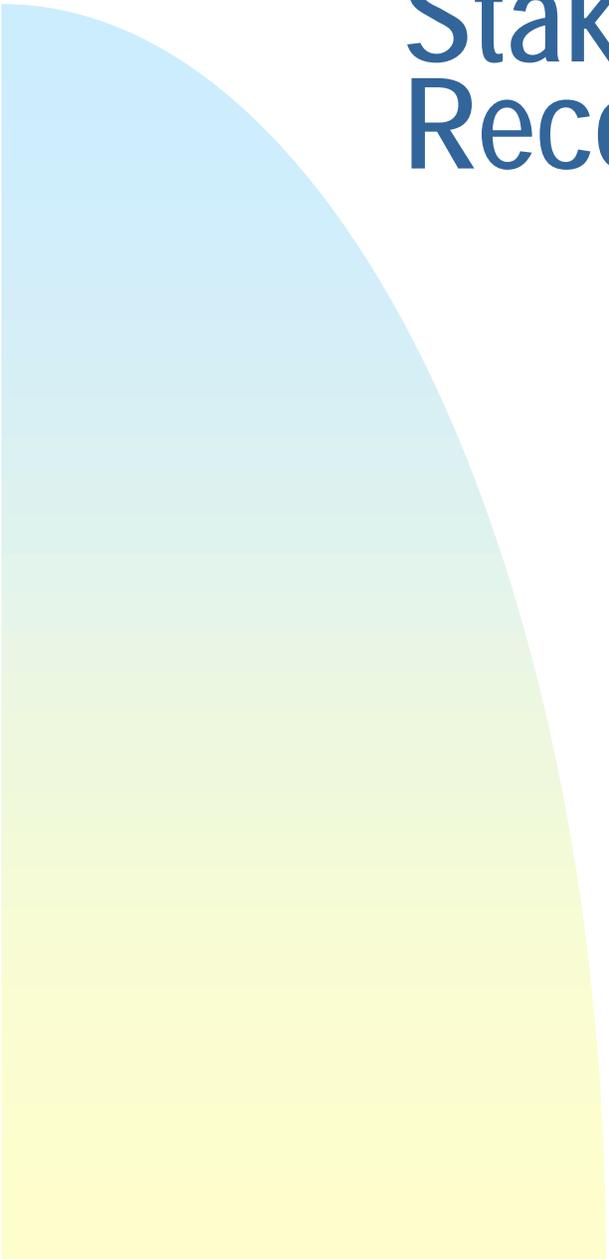
# Why Is Missouri Different?

- An explosion in Kansas City involved inadequate labeling of stored chemicals
- Six firefighters killed because they could not easily see they were dealing with explosive waste



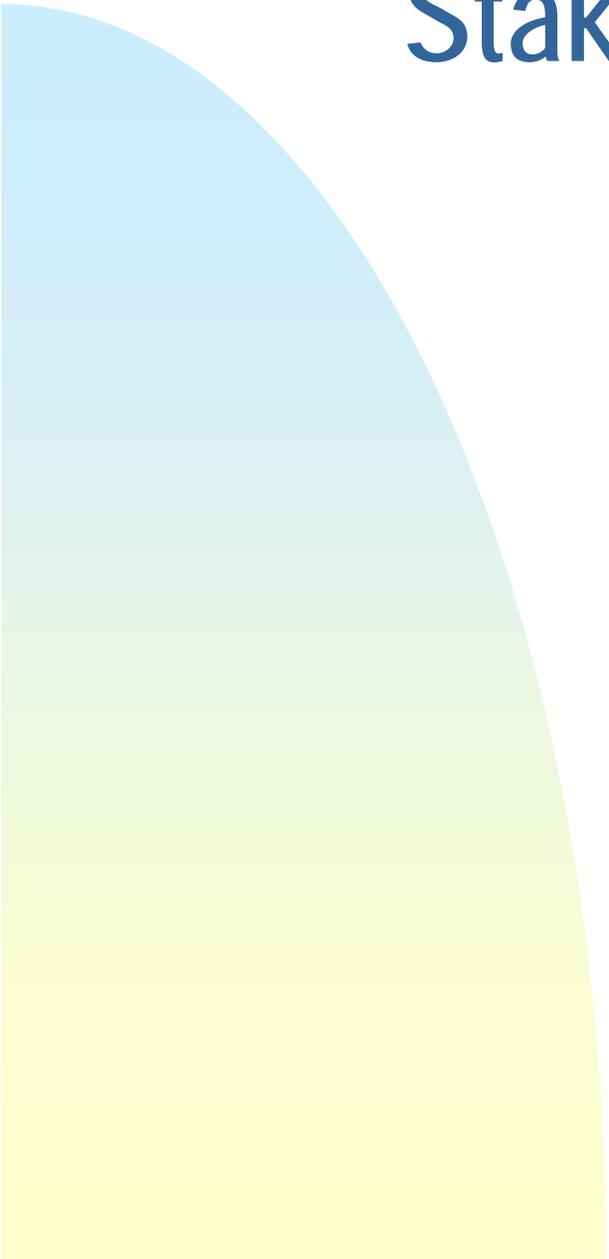
# Missouri's Intent

- Protect human health
- Provide emergency personnel with a way to quickly assess hazards of a situation
- Provide a highly visible sign in smoke or with a flashlight
- Identify potential hazards from a distance



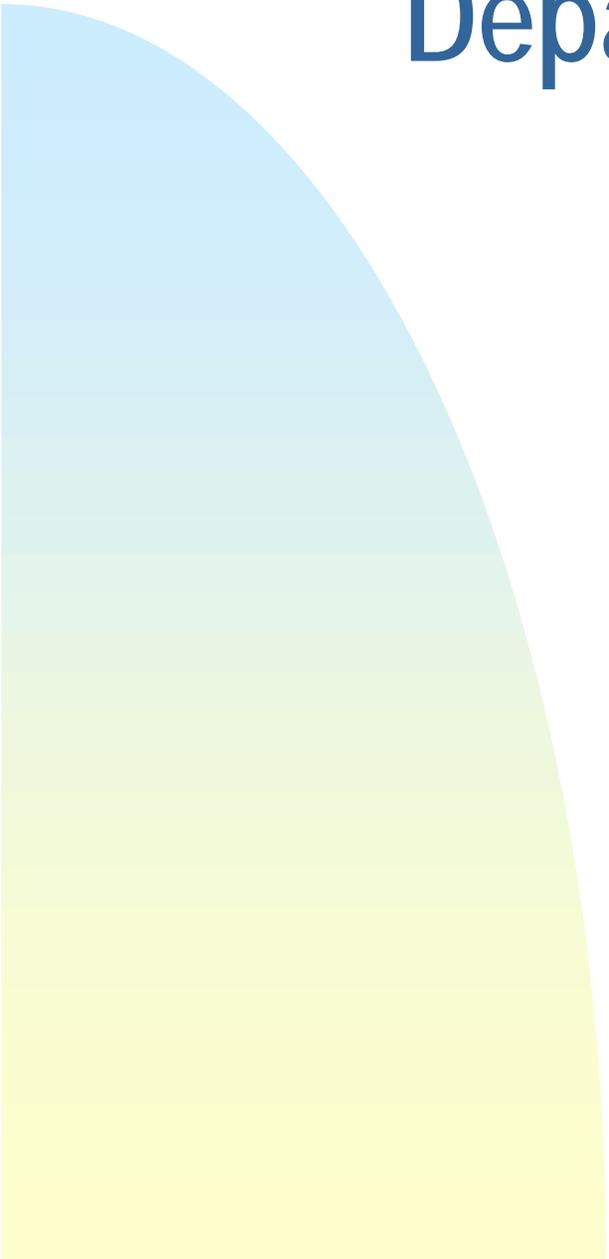
# Stakeholder Recommendation

- Remove requirement that containers temporarily storing hazardous waste be labeled during entire on-site storage
- Clarify that DOT compliance applies only at time of shipment



# Stakeholder Comments

- More expensive
- Time consuming
- Doesn't have an environmental benefit

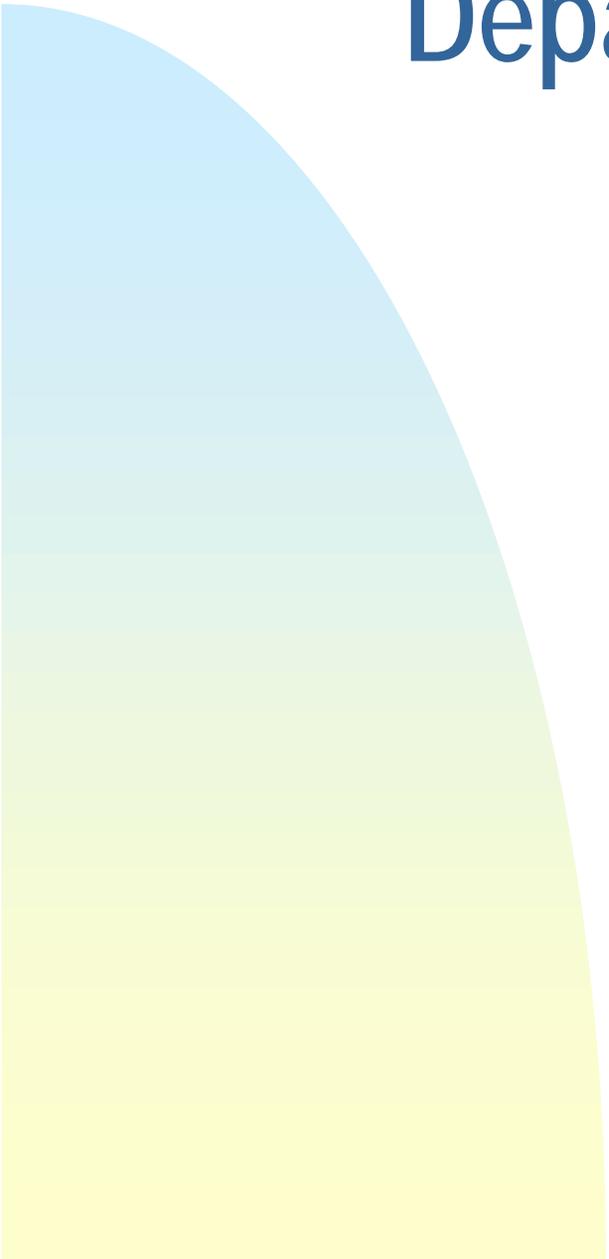


# Department Responses

- Emergency personnel can make quick and accurate decisions based on the content of the marking and labeling
- No extra burden or cost because marking and labeling are required at some point

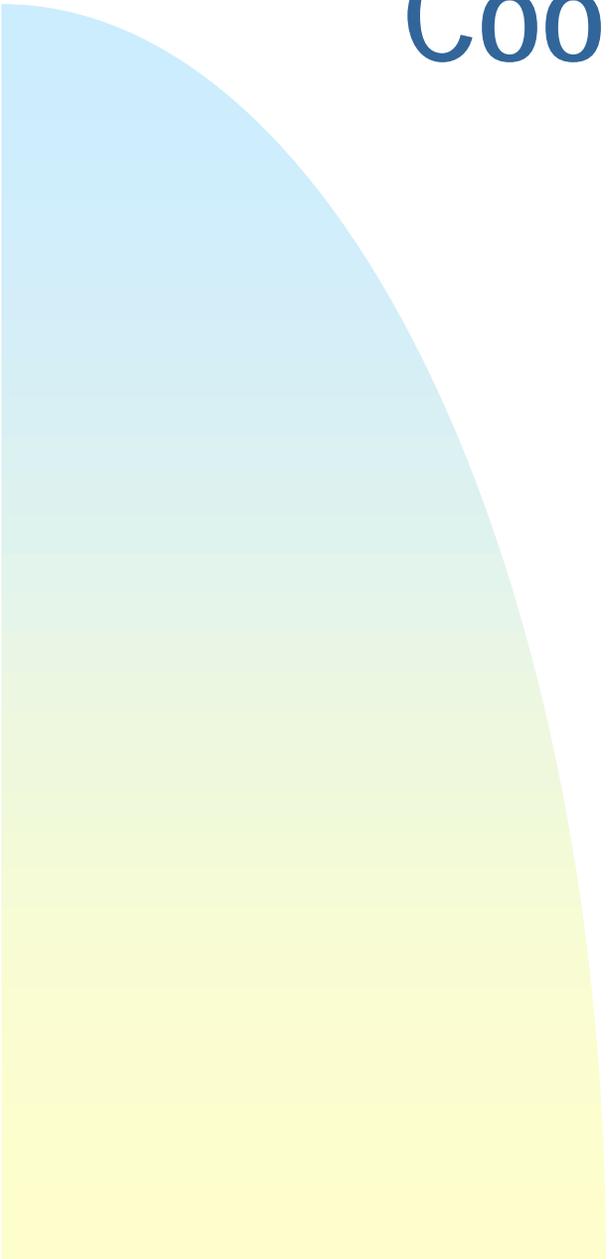
# Department Responses

- Stickers for markings are inexpensive  
(\$ .13 to \$ .32 per label depending on volume purchased)
- DOT marking and labeling are easily recognized from a distance in the case of emergency or abandonment



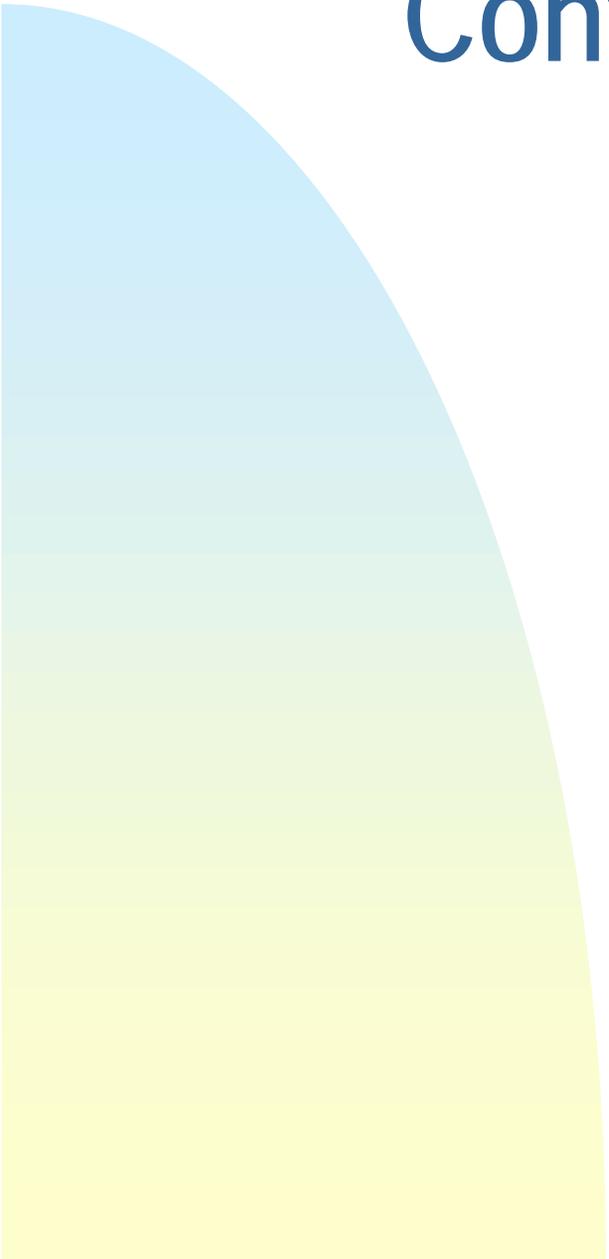
# Department Responses

- Inspectors rely on markings for adequate waste descriptions
- Facility personnel need to know container contents



# Cooperation

- DNR is willing to look at alternative standards, if the alternative is as protective
- Alternative methods should be simple, affordable and protective of emergency personnel and facility employees



# Contact Information

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