



Missouri  
Department of  
Natural Resources

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# Container Management Workgroup Overview

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# Presentation Overview

- Briefly review issues to be discussed in Container Management Workgroup
- Containment Requirements
- Safety Equipment Requirements
- Container Markings
- Present video: “Emergency in Apex”

# Containment Requirements

- Missouri requires a containment system for storage areas containing more than 1000 kilograms of free liquids.
- Additional requirements include:
  - A base free of cracks or gaps
  - Sloped base
  - Capacity equal to 10 percent of the containerized volume, and
  - Protection from run-on into the containment system

# Missouri's Intent

## Containment Requirements

- Regulations provide additional protection to groundwater and sewers.

# Initial Stakeholder Comments

## Containment Requirements

- Federal rules are adequate.
- State containment rules are excessive and too costly.

# Initial Stakeholder Recommendation

## Containment Requirements

- Rescind rule and prescriptive requirements for storage area design threshold

# Safety Equipment Requirements

- Missouri requires that generators and transfer facility operators provide safety equipment such as fire blankets, gas masks and self-contained apparatus in addition to those required by Federal rules.

# Missouri's Intent

## Safety Equipment Requirements

- Regulations provide additional protection to personnel.

# Initial Stakeholder Comments

## Safety Equipment Requirements

- Federal rules already require preparedness and prevention equipment.
- NFPA or local fire codes would be adequate.

# Initial Stakeholder Recommendation

## Safety Equipment Requirements

- Eliminate rule or,
- Require generators and transfer station operators follow NFPA criteria and local fire codes

# Container Markings

- Missouri regulations differ from federal regulations on when containers are marked.
- Missouri requires that generators package, mark and label during the entire time hazardous waste is accumulated on site.

# Missouri's Intent

## Container Markings

- 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

# Initial Stakeholder Comments

## Container Markings

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

# Initial Stakeholder Recommendation

## Container Markings

- 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