



Container Management Workgroup April 8, 2009 Meeting Summary

The first Container Management Workgroup was held April 8, 2009 in Jefferson City and was facilitated by Alice Geller. There were three main container management regulations the workgroup was going to discuss. These were: containment, labeling and protective equipment.

Compliance and Enforcement section chief Kathy Flippin told the workgroup that issues involving satellite accumulation were not planned to be part of the container management discussion.

Geller wrote concerns voiced by attendees on flip charts to use during further container management workgroup meetings.

Dennis Hansen went over Missouri's requirements for 1000 kg storage areas:

- Free of cracks and gaps.
- Sloped base.
- Keep containers out of liquid.
- Capacity = 10 percent of volume.
- Protected from run-on.

A workgroup member suggested changing the 10 percent requirement, to a 100 percent requirement, so labels don't have to be continually changed while a barrel is slowly being filled with waste – which sometimes takes many days or weeks.

A workgroup member also stated containment pallets increase the probability of a spill. This occurs because a forklift operator can't clearly see the drum or pallet and that increases the chances for a mistake. The suggestion was to eliminate the requirement for pallets in 90-day areas because they are inspected weekly.

A hazardous waste inspector commented he has seen drums moved improperly on the floor as well as on pallets. Also, if a drum is stored on the floor, and there is liquid around the drum, he can't look underneath to decide if the floor is sweating or the drum is leaking. He suggested moving one drum onto a pallet instead of moving a full pallet around the containment area.

A question was asked if the containment rules apply to a transfer facility or TSD and if trucks need to be on containment. Flippin replied they are performing the same job as a generator so the same rules apply. Containers on-site for greater than four days must be on containment.

The group then moved on to container markings.

Hansen read Missouri's requirements for Container markings:

- Visible sign.
- Able to discern hazards from a distance.
- Used during entire time HW is accumulated.
- Designed to protect health.

It was pointed out that current regulations state hazardous waste must be packaged when there is even a single container. More hazards occur, a workgroup member commented, from constant moving of containers.

Many workgroup members expressed concern because as material is added to a drum, the composition of the collected waste inside the drum can change, thus warranting a possible label change every time something is added.

It was suggested the regulations should require labeling to EPA standards, not DOT standards.

A workgroup member said small quantity generators can keep their waste in some type of satellite accumulation until it is officially deemed a waste. While some companies represented at the forum have a barcode tracking system, others commented a similar system would be too expensive for other, smaller companies.

Flippin showed examples of some of the required stickers/labels. One workgroup member suggested an alternative labeling system could be developed by the department that would not be as stringent as DOT requirements. As drums are filled, the DOT numbers sometimes change.

The conversation revolved around what is safe, and what is legally required. One workgroup member commented that if you can read a four-inch label, then you are too close. Another workgroup member responded the labels are as much for the workers as for emergency situations.

The group then moved to the third topic.

To start the third topic for the workgroup, Hansen read Missouri's requirements for safety equipment.

A hazardous waste inspector shared that inspectors look at a businesses' response plan, and then look for the corresponding safety equipment.

A workgroup member said his organization was once cited for not having a phone in an area immediately accessible to the storage area, though one was nearby.

Facilitator Alice Geller commented there are five regions and numerous state and federal inspectors. She said she would try to work with the state inspectors and see what can be done for consistency.

It was asked if the rules still need to be incorporated and why the rule stipulates generators and transfer facilities provide self contained breathing apparatus' and gas masks. A response was that the language says "such as self contained breathing apparatus...." not "must include self contained breathing apparatus" implying a breathing apparatus is not a requirement.