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Natural Resources

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Closed Containers

Nicole Eby



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Current MDNR Guidance

- Follows EPA guidance document dated December 3, 2009
- Information drawn from EPA regions and states
- [Closed Container Guidance: Questions and Answers-2011](#)

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Purpose of Closed Containers

- Minimize volatile emissions
- Protect ignitable/reactive waste from ignition/reaction
- Reduce potential mixing of incompatibles
- Prevent Spills
- Reduce direct contact with facility personnel

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Typical HW Containers

- EPA recommends a cover be properly secured
 - Rings are tightly bolted
 - Bungholes are capped
 - Possibly pressure/vacuum relief valves to avoid explosions

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Liquids in Satellite Accumulation

- Closed unless adding or removing waste
 - Container is closed when all openings are properly and secure affixed
 - Lids completely covering container
 - Release of volatiles is prevented
 - Spills are prevented if tipped
- At or near the point of generation
- Under control of the operator

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Liquids Continued

- EPA recommends a cover be properly secured
 - Varied Approaches
 - Special funnels
 - Spring closed lids
 - One way valves
 - Situation dependent! Contact MDNR or EPA
- Whatever the approach, it must prohibit the waste or emissions from exiting the containers

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Continuously Receiving Waste

- To prevent malfunctions or excess back pressure on device a vent system may be necessary
- Containers still must be closed to minimize releases
- Can check with MDNR for particular situations

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Solid and Semi-solid HW

- The lid must make contact with the rim all the way around
- Containers continuously or intermittently may remain open while process is in operation
- Foot pedal operated containers may be appropriate for wastes that do not contain free liquids

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Other Types of Containers

- Polysacks, boxes, roll-offs, Cubic Yard (Gaylord) boxes, semi-trailers
- Must be sealed to the extent necessary to keep HW and air emissions inside the container
- Dry filters – twist the neck of the bag
- Wet filters – double lined and sealed to prevent emissions

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Roll-Off Containers

- Roll-offs (No VOC) – lids shut and have a good seal around the rim
- Roll-offs (VOC) – subject to Subpart CC regulations for emissions

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Implementation

- Training and written guidance initially provided to Regional Offices
- Re-dissemination of materials
- Regular discussions
- Inspection report review

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Questions?

- Jim O'Leary
– (703) 308-8827 or oleary.jim@epa.gov
- Teena Wooten
– (703) 308-8751 or wooten.teena@epa.gov
- Hazardous Waste Enforcement Unit
– (573) 751-2032
