



## **Liquid Management and Container Disposal for Household Hazardous Waste Facilities**

Technical Guidance Document SW-2015-G1

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This document discusses how household hazardous waste (HHW) facilities should manage liquids and dispose of empty containers that previously held liquids.

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### **Applicability**

This guidance pertains only to HHW facilities. Hazardous waste generators should refer to technical guidance document HW-2005-G1, *Container Management for Hazardous Waste Generators*, for container management guidance.

Kansas Administrative Regulations 28-29-1100 through 28-29-1107 contain specific requirements for HHW facilities. This document includes recommendations not specifically required by the regulations. The recommendations are for guidance only and are not intended to replace other regulatory or safety requirements.

### **Hazardous Household Waste Liquid Management and Container Disposal**

If a waste has been determined to be hazardous and not suitable for re-use it must be stored and managed as HHW according to the facility's operating plan and all regulatory requirements. All HHW that is transported offsite for treatment, storage, or disposal must be prepared for offsite transportation according to the HHW regulations. This includes manifesting the HHW as hazardous waste and, for HHW facilities that meet the definition of a small quantity or large quantity generator of hazardous waste, complying with applicable land disposal restrictions treatment standards.

### Recommended Best Practices for Liquid HHW Management

Any identified HHW should be reused, if possible, or shipped as hazardous waste. KDHE recommends that all liquids be either poured off for bulking or solidified as appropriate. HHW items received that are considered to be impractical for bulking can be left in their original container and loose-packed within a corresponding hazard class drum for disposal.

### Emptying HHW Containers

In general, KDHE recommends that all containers be emptied of their hazardous waste contents prior to disposal of the containers in a permitted MSW landfill. Properly emptying HHW containers prior to disposal as solid waste helps ensure that no contamination or spillage will occur if the cap or bung is missing when the container is discarded in a trash can or dumpster, or when the container is compacted/crushed at the permitted MSW landfill.

An empty HHW container is one that has been emptied to the fullest practical extent employing commonly used practices for that type of container (e.g., pouring, pumping, aspirating). For liquid and semi-solid wastes, this means the removal of all free-flowing liquids that readily separate from the solid portion of the waste, container, or container liner under ambient temperature and pressure.

It may not always be practical to empty certain types of HHW containers due to their small size or configuration, specifically those items not originally meant to be opened or fully emptied. Different HHW facilities have different protocols, identified in their KDHE-approved operating plan, for the size of container that will be emptied. For example, at some facilities, closed containers of HHW with a

volume of one pint or less may be considered impractical to bulk.

It is not recommended that P-listed containers be emptied of their contents. Even if a container of a P-listed waste is emptied, to the fullest practical extent, **the container itself will be a P-listed waste and must be disposed of as a hazardous waste** unless additional steps are taken (refer to technical guidance document HW-2005-G1, *Container Management for Hazardous Waste Generators* for additional information).

### **Nonhazardous Household Waste (NHHW) Liquid Management and Container Disposal**

Liquid and semi-solid NHHW that is not redistributed may be disposed of within the following guidelines.

NHHW liquid waste may be disposed of in a sanitary sewer connected to a publically owned treatment works (POTW) only if authorization has been obtained from the POTW. The empty container may then be disposed of in a permitted municipal solid waste (MSW) landfill.

If liquid or semi-solid NHHW waste is in the original container and the volume of the container is not greater than five gallons, then the container with its contents may be disposed of in a permitted MSW landfill. Alternatively, liquid or semi-solid NHHW waste may be solidified in a container and disposed of in a permitted MSW landfill, without the volume and original container restrictions.

In summary, empty HHW containers may be disposed of in a permitted MSW landfill, with the exception of empty containers that once held P-listed waste. Facilities should employ the methods described in their KDHE-approved operating plan, if applicable, for removing free-flowing liquids from HHW containers.

For additional information regarding the proper management of solid or hazardous waste in Kansas, you may visit the Bureau of Waste Management website at [www.kdheks.gov/waste/](http://www.kdheks.gov/waste/) or contact the Bureau at: (785) 296-1600, [bwm\\_web@kdheks.gov](mailto:bwm_web@kdheks.gov), or the address at the top of this document.