

HAZARDOUS WASTE CONTAINER MANAGEMENT



Kansas Department of Health and Environment
Bureau of Waste Management

TYPES OF HAZARDOUS WASTE CONTAINERS

- **Satellite Accumulation Containers**
(also referred to as satellite containers)
 - Day accumulation containers – a special type of satellite accumulation container that requires written notification to KDHE
- **Storage Containers** (also referred to as accumulation containers)

ALL HAZARDOUS WASTE CONTAINERS

- Must be labeled with the words “Hazardous Waste”
- Must be kept closed except when adding or removing hazardous waste.
- Must be in good condition (no rust, dents, leaks, etc.)
- Must be compatible with the contents of the container (no liquids in cardboard, etc.)

GOOD EXAMPLE



OPEN AND NOT PROPERLY LABELED



OPEN CONTAINER



POOR CONDITION, OPEN, NOT LABELED



SATELLITE CONTAINERS

Hazardous waste may be accumulated in satellite containers without being subject to accumulation time limits provided each satellite container is managed as follows:

- No more than one container of each type of hazardous waste (55 gallons or less of non-acutely hazardous waste or one quart or less of acutely hazardous waste listed in 40 CFR 261.33(e)).
- The container is located at or near any point of generation where the waste initially accumulates.
- Each container is under the control of the operator of the process generating the waste.

SATELLITE CONTAINERS

- Mark with the accumulation start date when the container is full, when a second container of the same waste stream is started, or when **55 GALLONS** (not pounds) is exceeded.
- Move to the storage area within 3 days of becoming full (or no longer meeting the definition of satellite).
 - Alternatively, the container can be left in the satellite area and managed as a storage container.

SATELLITE CONTAINERS

- KDHE is more stringent than EPA for Satellite Containers as follows:
 - Only 1 container of each waste stream at each point of generation (EPA allows multiple containers)
 - Must be labeled with the words “Hazardous Waste” (EPA allows alternative wording describing the contents of the container)

STORAGE CONTAINERS

- Mark with the accumulation start date (the date storage began).
- Inspect weekly or monthly (depending on generator status) for condition, labeling, compatibility, etc.
 - Inspections must be documented and kept for 3 years.

Pre-Transport Requirements (When ready to ship)

- Applies to all generators except CESQGs who accumulate less than 25 kg (55 pounds) of hazardous waste on-site or CESQGs or KSQGs transporting less than 55 pounds of their own waste to a reclamation facility or household hazardous waste (HHW) facility.
 - Have placards available for transporters
 - Prior to shipping:
 - Package waste in proper DOT containers
 - Label each container per DOT regulations
 - Mark each container per DOT regulations

AEROSOL CANS

- If the contents are hazardous waste, it is usually because they are not empty, but just clogged. KDHE will allow aerosol cans to be accumulated in one location in the facility, typically a maintenance area, to determine if the cans can be fixed. Once they are determined to be a waste, they must be accumulated in a satellite accumulation container or a storage container.

AEROSOL CANS (Continued)

- If you choose to use a can puncturer, the waste cans are accumulated in a satellite accumulation container next to the puncturing device.
- The act of puncturing the cans and collecting the contents is HW treatment, but is allowed as long as nothing is released.

AEROSOL CANS (Continued)

- The container receiving the liquid hazardous waste is a satellite container because it is receiving a newly generated waste stream (generated from the treatment).
- The emptied cans can be recycled or disposed (unless they contained p-listed waste).

AEROSOL CANS (Continued)



QUESTIONS???