

Lids, Leaks, Labels & Location

The most commonly cited violations of hazardous waste/hazardous materials regulations are:

- Open containers or lids not screwed-on tight;
- Improper labels/identification or lack of a label;
- Lack of secondary containment; and
- Waste storage location.

What may seem like a relatively minor violation can result in fines of several thousands of dollars per violation. Observing simple practices can keep the University of North Carolina at Chapel Hill in compliance. (See reverse side for pictures of proper procedures.)

Lids

ARE ALL CONTAINERS CLOSED AND WITH PROPER LIDS?

- Lids/caps must be securely in-place except when material is being removed or added to the container. A funnel resting on the mouth of a bottle does not constitute a lid, even when a watchglass is used.
- Lids/caps on waste containers must be tight (Note: be sure that gas producing reactions, e.g., organics in acids, have worked to completion before transferring the material to a hazardous waste container). A good rule of thumb is: A closed container, when tipped over, won't leak.

Leaks

ARE CONTAINERS STORED IN SECONDARY CONTAINMENT?

Secondary containment is to be used to minimize the potential for breakage and to minimize the consequences in the event of breakage. If a spill occurs in secondary containment it should be cleaned up immediately. Without exception, secondary containment is required for the following:

- all glass containers of liquid hazardous materials stored on the floor;
- all containers, with capacity of ≤ 4 liters, of liquid hazardous waste, regardless of storage location.

In general, secondary containment is to be used as a means of preventing incompatible materials from interacting in the event of breakage and/or spillage of hazardous materials. For example, acid baths are to be provided with secondary containment. Hazardous materials are to be segregated by compatibility group and stored in separate cabinets, trays, or pans.

Labels

ARE ALL CONTAINERS PROPERLY LABELED?

- OSHA Regulations require that the name of the chemical be clearly identified. Chemical formulas and abbreviations, such as H_2SO_4 , HCl, EtBr, ETOH, etc., are not acceptable.
- Hazardous waste regulations require the words "Hazardous Waste" or words which clearly identify the contents, e.g., "Acetone Waste" be on each waste container.

Location

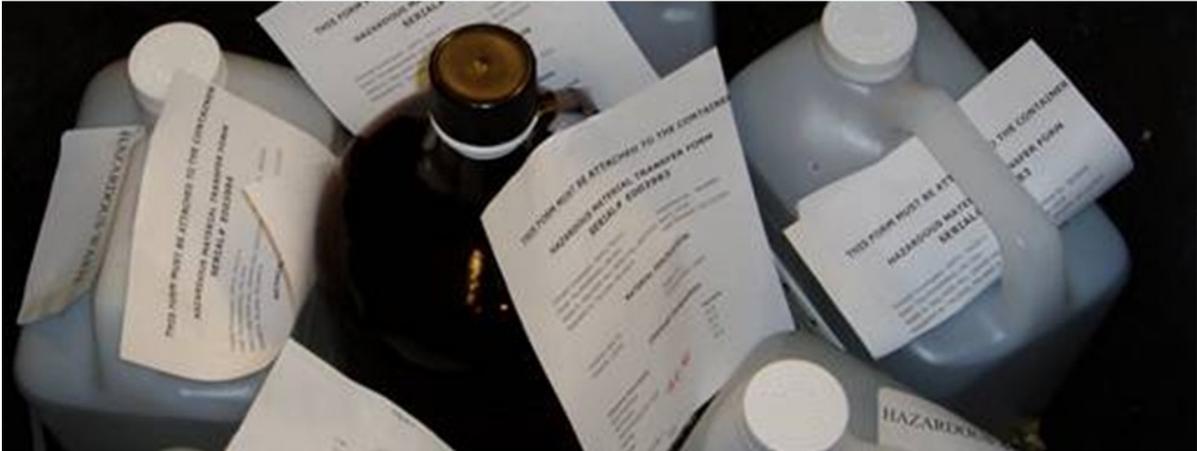
ARE ALL WASTE CONTAINERS STORED AT OR NEAR THE POINT OF GENERATION?

- Hazardous waste regulations require that the generator accumulate hazardous waste in containers (properly closed, labeled, and less than 55 total gallons) **at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste.** Wastes cannot be stored in a separate room or down the hall.

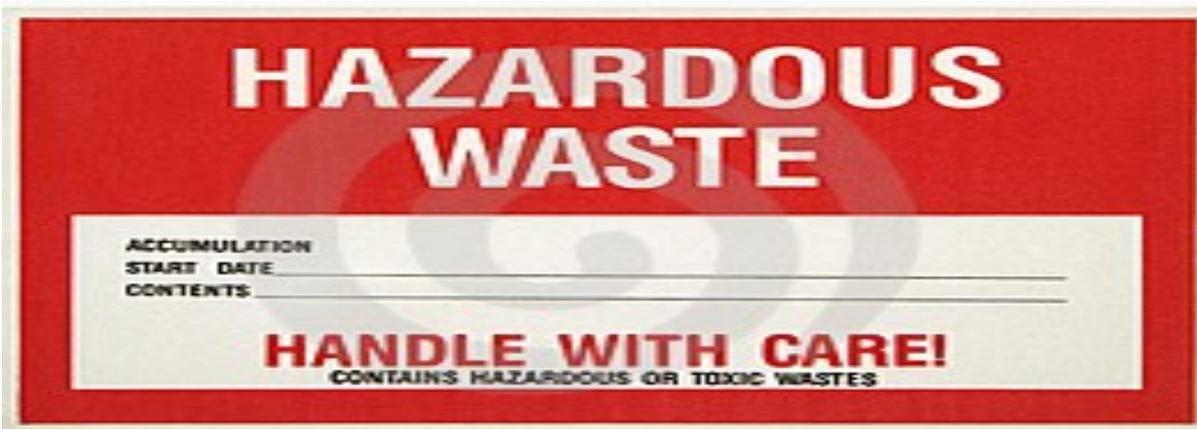
(See reverse side for pictures of proper procedures.)



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Lids: The original lid is usually the best lid to use. The container must not leak.



Labels: Hazardous waste must be properly labeled to clearly identify the contents.



Leaks & Location: Waste must be in secondary containment, under the control of the generator, and labeled.