

# Closed Container Guidance for Hazardous Waste Generators

PUB –WA 1342 2009



Waste & Materials Management  
P .O. Box 7921  
Madison, WI 53707-7921

The hazardous waste rule, s. NR 665.0173(1), Wis. Adm. Code, requires that "a container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste." Section NR 665.0173(2) specifies that "a container holding hazardous waste may not be opened, handled or stored in a manner which may rupture the container or cause it to leak."

These rules are intended to help protect ignitable or reactive wastes from sources of ignition, prevent spills of hazardous wastes or releases of volatile wastes and reduce the potential for mixing of incompatible wastes. However, because there is no definition of closed container specified in either the state or federal hazardous waste rules, this document is intended to provide guidance on the closed container requirements for containers in central hazardous waste storage areas and satellite accumulation areas. It also provides examples of what the department considers acceptable practices that meet these requirements.

## Containers Storing Liquids

A container storing liquid hazardous waste in a satellite accumulation or central storage area must be closed to prevent the escape of vapors or spills if the container is tipped or knocked over.

When using open-top drums (the entire lid is removable and usually is secured with a ring and bolt) to store liquids, this can be accomplished by clamping or tightly bolting the band that seals the lid to the container. Alternatively, the lid of an open-top drum may be placed on top without the ring in place as long as there is complete contact with the rim all the way around the top **and** the container is secured with a chain or strap to a wall, building support column or to stationary equipment in the area. Secure the lid at the end of the work shift.

Storage of liquids in open top drums without lids is not acceptable even if the liquid has high viscosity or it contains solids which would settle to the bottom.

On closed-top drums (containers that have two bung holes with non-removable lids), the container is closed by tightening the bungs securely. If waste is frequently added to containers, there are a number of commercially available devices that are acceptable for closing the container, if the devices are properly used and maintained. For example, special funnels with manual or spring loaded lids may be used on closed-top drums. Funnels used to add or remove liquid hazardous wastes into these containers should be screwed tightly into the bunghole and fitted with a gasket, if necessary, to seal the funnel lid firmly closed.

In some cases, the funnel lids for closed-top drums may be fitted with a locking mechanism. This keeps the lid in a closed position unless it is necessary to add or remove hazardous waste. All other openings on the drum lid should be properly covered or capped. There are funnels with a one-way valve that allows hazardous waste to enter the container, but prohibits waste or emissions from exiting the container.

Valve vents and level indicators may be used on containers if the containers are closed after the addition of liquids. Level indicators are used to prevent the overfilling of a container.

## Containers Storing Solids

For solid and semi-solid hazardous wastes, such as dewatered metal-bearing wastes or sludges, or discarded pharmaceuticals, the container is considered to be closed if the lid is placed squarely on the container, where there is complete contact between the lid and the rim all around the top of the container. At the end of a shift, secure the lid by bolting the band that seals the lid to the container or with a band that is tightened with a lever.

For solids that have the potential to release vapors, follow the above guidance for containers storing liquids.

Containers with covers opened by a foot pedal, such as flip-top or spring loaded lid or with a self-closing swinging door, may be used for semi-solid and solid hazardous wastes. These containers are considered to be closed when the covers make complete contact between the lid and the rim all the way around the top.

Containers of this type are appropriate for wastes such as rags, batteries, aerosol cans or solvent-contaminated wipes that do not contain free liquids.

Roll-off boxes are primarily used for storage and transportation of solids or sludges. Some roll-off containers are manufactured with lids that open and close. When these lids are closed tightly with a good seal around the rim, the container is considered to be “closed.” Use roll-off containers with lids for wastes that contain volatile organic vapors. If the waste is a non-volatile solid or sludge, the roll-off box is considered “closed” when a tarp is placed so the cover stays squarely on the container at all times. Once the roll-off container is full, tightly secure the tarp by tying or strapping it firmly to the container.

**NOTE:** Refer to subch. CC of ch. NR 665, for specific requirements to control air emissions from continuous feed organic waste streams in roll-off containers.

Hazardous waste may be stored in other types of containers too, such as bags, boxes and totes. For example, waste paint filters are sometimes stored in bags. These bags are considered to be closed when the neck of the bag is tightly bound to prevent the release of the volatile compounds.

Cubic yard bags of a non-VOC hazardous waste, such as F006 plating sludges, are considered to be closed if the neck of the bag is twisted shut between batch filling. Securely tie off the cubic yard bag when the bag is full.

Because it is more likely that small containers such as 5 gallon pails could tip over, cover these containers tightly at all times except when waste is being added or removed.

## For more information

- Call your regional Waste and Materials Management Program staff at:

<http://dnr.wi.gov/org/aw/wm/contacts/regions.htm>



Northeast Region	(920) 662-5100
Northern Region, Spooner	(715) 635-2101
Rhinelander	(715) 365-8900
South Central Region	(608) 275-3266
Southeast Region	(414) 263-8500
West Central Region	(715) 839-3700

- Review the hazardous waste rules, chs. NR 600 to 679, Wis. Adm. Code, and statutes available at: <http://dnr.wi.gov/org/aw/wm/hazard/>

**Disclaimers:** This document is intended solely as guidance and does not include any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any manner addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

The Wisconsin Department of Natural Resources provides equal opportunity in its employment, programs, services and functions under an Affirmative Action Plan. If you have any questions, please write to Equal Opportunity Office, Department of the Interior, Washington, D.C. 20240. This publication is available in alternative format (large print, Braille, audio tape, etc.) upon request. Please call (608) 266-2111 for more information.