

Hazardous waste must be packaged in accordance with DOT, EPA, and possibly state regulations before being stored or transported.

The initial step in selecting the proper container is to make a waste characterization (40 CFR 262.11). Once the hazards are identified, 49 CFR Subpart D & F can be consulted to choose a DOT specification container (49 CFR Part 178) that is compatible with the waste material. Lastly the container must be in shippable condition.

The following information is provided as guidance in checking a DOT specification containers' physical condition & structural integrity. If either of these are compromised, the material should be transferred to another drum or a DOT specification overpack may be required.

1. Drums of liquids should never be filled to the top. Outage space is required.
2. No drum should weigh more than the rated container capacity.
3. The drum exterior should be free of waste (including lid).
4. Drums must not be leaking or have visible staining (indicating a leak).
5. Any dents/creases present cannot effect the drum integrity. This is especially important if there is damage to the drum chime or seam.
6. Any rust may be indicative of compromised integrity. Flaking or crumbling areas are evidence of loss of drum wall thickness.
7. Proper bungs with gaskets must be used to close the drum (poly bungs for poly drums, etc) and they must be tightened.
8. Open top drum lids must seat properly, have complete gaskets.
9. Drum rings must fit properly & be the appropriate ring for the drum (most often a 15/16" bolt & nut tightened to the proper specification from the drum manufacturer).
10. Snap rings or lightweight rings/bolts can not be used for hazardous waste drums or any liquids.
11. No closure may leak when the drums are tilted for movement or loading.
12. Drums can not be bulging or distended in any manner, and should be evaluated for either heat stress or a reaction.
13. Drums can not be fuming, off-gasing, or in an exothermic state, and should be evaluated for a reaction.
14. All DOT and Waste labels must be affixed to the containers adjacent to each other so that all can be seen at the same time.
15. All old labels and markings must be removed from drums prior to use for a different material.
16. Lab packs containing liquid must be surrounded by a chemically compatible absorbent material in sufficient quantity to absorb the total liquid contents.

Additional information can be found at: <https://www.epa.gov/quality/packing-marking-labeling-and-shipping-environmental-and-waste-samples>