

MARKING AND LABELING – WHY THE CHANGES?

- Previous RCRA labeling regulations did not require generators to identify and indicate the hazards of hazardous wastes accumulated in containers, tanks, drip pads and containment buildings
 - Resulted in a failure to communicate risks associated with wastes being accumulated/stored in different locations
 - Can impact workers, waste handlers, emergency responders and visitors
- Areas affected include:
 - Generator satellite accumulation areas and central accumulation areas
 - Transfer facilities consolidating hazardous wastes from different generators
 - Generator container and tank storage areas at TSDF

MARKING AND LABELING

- Container and tank labels must have the words “Hazardous Waste” and also indicate the hazards of the contents of the containers
- Flexibility in how to comply with this new provision using any of several established methods (e.g., DOT hazard communication, OSHA hazard statement or pictogram, NFPA chemical hazard label, or RCRA characteristic)

EXAMPLES OF LABELS THAT INDICATE THE "HAZARDS"

- The applicable hazardous waste characteristic (i.e., ignitable, corrosive, reactive, toxic)

HAZARDOUS WASTE

ACCUMULATION START DATE:



TOXIC

HAZARDOUS WASTE

ACCUMULATION START DATE:



CORROSIVE

EXAMPLES OF LABELS THAT INDICATE THE "HAZARDS"

- Hazard communication consistent with DOT (49 CFR part 172 subpart E – labeling or subpart F – placarding)



EXAMPLES OF LABELS THAT INDICATE THE "HAZARDS"

- Hazard statement or pictogram consistent with OSHA (29 CFR 1910.1200)



EXAMPLES OF LABELS THAT INDICATE THE "HAZARDS"

- Chemical hazard label consistent with the National Fire Protection Association code 704



MARKING AND LABELING

- EPA is providing flexibility on how to indicate the hazards of the contents of the containers
- Some clarifications:
 - Labeling should occur at the initial point of generation
 - For containers that have small containers inside (e.g., tubes, vials, etc.), generators can mark the outer/secondary container or attach a tag with the required information