

Universal Waste Bulk Packaging Guideline

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For Battery Packaging Guidelines, Please See Separate Document On The RecyclePak Website.



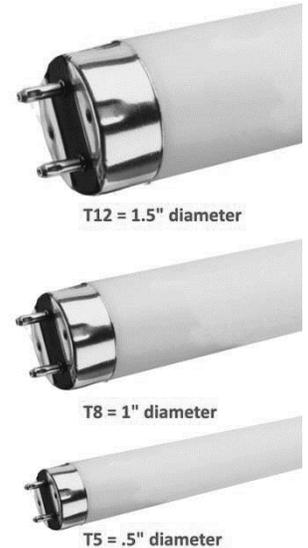
Straight Fluorescent Lamp Packaging Guideline

The procedures outlined in this document must be used to store and prepare “Universal Waste” fluorescent lamps for proper recycling. Questions regarding this document should be directed to customer service, toll-free at 1-800-556-5267. All precautions should be taken to eliminate breakage of lamps. Extra charges may result from excessive breakage.

General Packaging Guidelines for Straight Fluorescent Lamps

1. Lamps should be packaged in containers that protect the lamps during the storage and transport. Acceptable containers include: cardboard boxes, fiber drums, or the original manufacturer cardboard boxes. Boxes that are designed to transport lamps may also include a poly liner. Veolia can provide containers for fluorescent lamps, contact customer service toll free at 1-800-556-5267 for more information.
2. Place lamps carefully into the container as to avoid breakage.
3. Egg crate type inserts are not required, but boxes and drums should be filled to prevent excess movement of lamps during transport, leaving no void space.
4. Box ends must be secured with tape. Three-inch PVC tape is recommended. **VEOLIA WILL NOT ACCEPT CONTAINERS FOR SHIPMENT THAT HAVE LAMPS EXPOSED OR PROTRUDING FROM THE PACKAGING.**
5. **DO NOT tape lamps together.**
6. **DO NOT** place items other than fluorescent lamps into containers.
7. Any shipment greater than 10 boxes should be palletized, four foot boxes on a four foot pallet, eight foot boxes on an eight foot pallet. (Any overhang will result in breakage and will not be accepted). Pickups that exceed 10 boxes and are not palletized may be subject to additional charges.
8. Boxes must be placed on a pallet by evenly stacking boxes in layers. **DO NOT EXCEED 48” IN HEIGHT.**
9. Once they have been placed on a pallet, the boxes must be secured with shrink or stretch wrap. (Remember to wrap the pallet as well, to minimize shifting in transit).
10. Please remember that when reusing boxes after a retrofit, switching from T12 to T8 boxes will result in a diameter differential, T12 bulbs are 50% wider than T8 bulbs.
11. Lamp Inventories should be taped to the outside of the lamps boxes. Alternatively the boxes can be marked with the lamp type and count.

Types of Straight Fluorescent Lamps



Labeling as Universal Waste

All packages used for containing fluorescent lamps must have a label that states “**Universal Waste Lamps**” or a similar statement as authorized by state regulation.

Storage of Lamps

Universal waste lamps must not be stored in excess of one year. To demonstrate the storage time, mark all containers with an “**Accumulation Start Date**” (the beginning date the lamps were stored for disposal). All lamps should be stored in a manner that prevents breakage and should be stored indoors, protected against the elements. Wet packages are subject to additional handling fees. The universal waste rule requires boxes containing universal waste lamps to be kept closed unless adding or removing lamps.

Breakage

If lamp breakage should occur, broken glass and lamp constituents may be subject to additional regulation. Call Veolia toll-free at 1-800-556-5267 for assistance with shipping crushed or broken lamps. If broken prior to packaging, lamps should be placed into plastic or steel drums. Breakage during transport is possible, therefore taping of box ends with tape is recommended. If box contains a liner make certain liner is sealed well before transport.

Lamp Inventories

Customers are encouraged to tape lamp inventories to the end of each box. An inspection will be made at Veolia of all containers to verify lamp type and count received. Each container of fluorescent lamps will be billed for the full amount of lamps as received on the shipment.



Other Suggestions:

- Whenever possible store lamps in an area accessible to the vehicle which will be picking them up.
- Minimize the number of people managing the lamps to only those that are properly trained. Collecting mercury-containing fluorescent lamps for disposal requires care to minimize breakage and an awareness of possible exposure to mercury and broken glass hazards.
- Take an in-house inventory of lamps while loading and maintain a record-keeping system for spent lamps.

Available Veolia Lamp Containers

Containers can be provided by Veolia. Please contact customer service toll-free at 1-800-556-5267 for additional details. Additional packaging may be available.

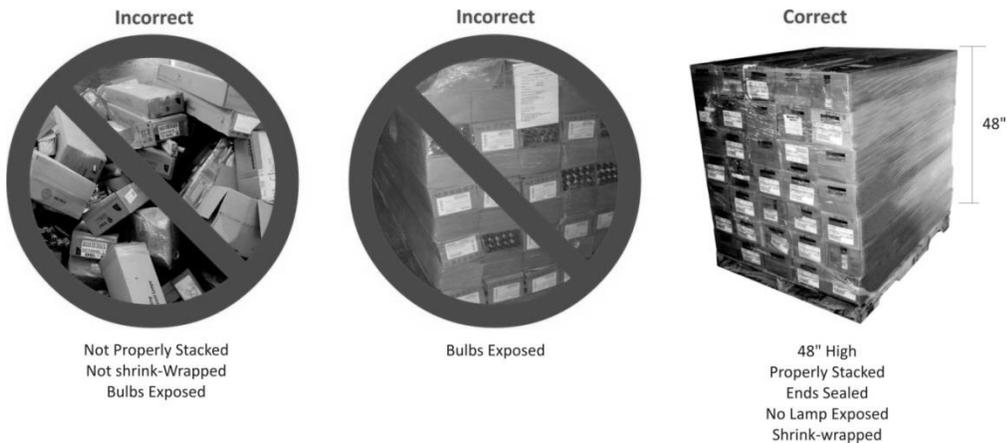
SKU	Type	Dimensions	Capacity
Supply-280	Corrugated Box	8.5x8.5x48	30 T12 or 72 T8 4ft straight lamps or 10 T12 or 20 T8 u-tubes
Supply -262	Corrugated Box	40x48x50	800 T12 or 1600 T8 straight lamps or 360 400w HIDS or 312 T12 or 480 T8 u-tubes
Supply -281	Corrugated Box	8x8x96	25 T12 or 57 T8 8ft straight lamps
Supply -282	Corrugated Box	22x22x24	46 T12 or 81 T8 u-tubes or 60 400w HIDS or Misc CFLs
Supply-036	Fiber Drum*	16.25 x 48	85 4' T12 lamps or 170 4' T8 lamps
Supply-001	Fiber Drum*	20.75 x 48	140 4' T12 lamps or 280 4' T8 lamps
Supply-258	Flexible Waste Drum*	17.5x17.5x27	250 lbs. of waste materials
Supply-006	Steel Drum*	55 gal – 34.50 x 24	600 lbs of broken or crushed lamps

* UN/DOT approved

How to Palletize Lamps

Palletizing lamps correctly ensures not only compliance with DOT regulations regarding shipping fluorescent lamps, but also decreases costs by optimizing truck load capacity. Pallets should be used to store lamps and aid truck loading with the availability of a fork lift and loading dock. Both lamp cartons and drums may be loaded on pallets into the truck and, if necessary, hand loaded from pallets to maximize truck capacity. 4 foot lamp boxes should be stacked in layers, in the same direction to minimize pallet sizes and maximize truck capacity. The boxes should not exceed 48" in height. 8 foot lamp boxes should be stacked parallel with the eight foot pallet All pallets of lamp cartons should be stretch-wrapped to the pallet.

Examples of Properly and Improperly Packaged Lamps





Specialty Lamp Packaging Guidelines (HID Lamps, Compact Fluorescent Lamps, and U-Tubes)

The procedures outlined in this document must be used to store and prepare “Universal Waste” specialty lamps for proper recycling. Questions regarding this document should be directed to customer service, toll-free at 1-800-556-5267. All precautions should be taken to eliminate breakage of lamps. Extra charges may result from excessive breakage.

General Packaging Guidelines for Specialty Lamps

1. Specialty lamps may be packaged in the strong outer packages. Strong outer packages are containers that are sturdy, durable, and constructed so that it will retain its contents under normal conditions of transportation. This includes original manufacturer boxes, other cardboard boxes, or fiber, plastic or steel pails and drums.
2. Sort all specialty lamps by type. **DO NOT MIX** specialty lamps.
3. Place specialty lamps in a strong outer package in a manner to prevent breakage. Where possible, avoid glass to glass pressure point. Examples include placing HID lamps into the cardboard sleeves used to ship the replacement lamps or wrapping the lamps.
4. Any shipment greater than 10 boxes or pails should be palletized, Pickups that exceed 10 containers that are not palletized may be subject to additional charges. Containers must be placed on a pallet by evenly stacking in layers. **DO NOT EXCEED 48” IN HEIGHT.**
5. Once they have been placed on a pallet, the containers must be secured with shrink or stretch wrap. (Remember to wrap the pallet as well, to minimize shifting in transit).
6. Fiber and steel drums may be palletized for shipment.

Labeling as Universal Waste

All packages used for containing specialty lamps must have a label that states “**Universal Waste Lamps**” or a similar statement as authorized by state regulation.

Storage of Lamps

Universal waste lamps must not be stored in excess of one year. To demonstrate the storage time, mark all containers with an “**Accumulation Start Date**” (the beginning date the lamps were stored for disposal). All lamps should be stored in a manner that prevents breakage and should be stored indoors, protected against the elements. Wet packages are subject to additional handling fees. The universal waste rule requires boxes containing universal waste lamps to be kept closed unless adding or removing lamps.

Breakage

If lamp breakage should occur, broken glass and lamp constituents may be subject to additional regulation. Call Veolia toll-free at 1-800-556-5267 for assistance with shipping crushed or broken lamps. If broken prior to packaging, lamps should be placed into plastic or steel drums. Breakage during transport is possible, therefore taping of box ends with tape is recommended. If box contains a liner make certain liner is sealed well before transport.

Lamp Inventories

Customers are encouraged to tape lamp inventories to the end of each box. An inspection will be made at Veolia of all containers to verify lamp type and count received. Each container of specialty lamps will be billed for the full amount of lamps as received on the shipment.

Other Suggestions:

- Whenever possible store lamps in an area accessible to the vehicle which will be picking them up.
- Minimize the number of people managing the lamps to only those that are properly trained. Collecting specialty lamps for disposal requires care to minimize breakage and an awareness of possible exposure to mercury and broken glass hazards.
- Take an in-house inventory of lamps while loading and maintain a record-keeping system for spent lamps.
- Sort all specialty lamps by type. **DO NOT MIX** specialty lamps.

Types of Specialty Lamps



Spiral Compacts



Plug-In Compacts



High-Intensity Discharge



U-tubes



Available Veolia Specialty Lamp Containers

Containers can be provided by Veolia. Please contact customer service toll-free at 1-800-556-5267 for additional details. Additional packaging may be available.

SKU	Type	Dimensions	Capacity
Supply-005	U-Tube Box	Varies by Region	Varies by Region
Supply-006	Steel Drum*	55 gal – 34 ½" x 24"	600 lbs of Lamps
Supply-011	Cubic Yard Box*	36"x36"x36"	1100 lbs
Supply-094	Cubic Yard Box	36"x36"x36"	1100 lbs

* UN/DOT approved

How to Palletize Lamps

Palletizing lamps correctly ensures not only compliance with DOT regulations regarding shipping fluorescent lamps, but also decreases costs by optimizing truck load capacity. Pallets should be used to store lamps and aid truck loading with the availability of a fork lift and loading dock. Both lamp cartons and drums may be loaded on pallets into the truck and, if necessary, hand loaded from pallets to maximize truck capacity. Boxes should be stacked in layers, in the same direction to minimize pallet sizes. The boxes should not exceed 48" in height. All pallets of lamp cartons should be stretch-wrapped to the pallet.



Lamp Ballast Packaging Guidelines

The procedures outlined in this document must be used to store and prepare lamp ballast for proper recycling. The packaging, labeling and marking requirements will be dependent on the type of ballast contained within the package. For additional information on lamp ballasts, see the Ballast Appendix. Questions regarding this document should be directed to customer service, toll-free at 1-800-556-5267. All precautions should be taken to eliminate leaking ballast. Extra charges will apply to all containers received with leaking ballast.

General Packaging Guidelines for Lamp Ballast

1. PCB containing lamp ballast must be packaged in DOT specification containers, such as a 55-gallon steel drum or a 5-gallon pail and it is recommended that all other lamp ballast also be packaged in specification containers.
2. By law, DOT specification containers must not exceed the rated capacity of the container. A standard 55 gallon drum is rated for a gross weight of 550 lb. while other drums may be rated for as much as 800 pounds. Therefore, the number of ballast per drum should not exceed:
 - a. 200 4' ballast,
 - b. 94 8' slim line ballast,
 - c. 68 8' HO ballast, or
 - d. Equivalent combination of ballast types.

A good approximation to follow is to only fill 55g drums of ballasts 2/3 full in order to avoid exceeding the DOT weight limit of the container.

3. A typical 5 gallon pail will be rated for approximately 66 pounds. Therefore, the quantity of ballast per pail should not exceed:
 - a. 16 4' ballast,
 - b. 8 8' slim line ballast,
 - c. 6 8' HO ballast, or
 - d. Equivalent combination of ballast types.
4. Drums must be labeled pursuant to applicable U.S. DOT and EPA regulations. Labels can be provided by Veolia.
5. Veolia ships empty steel drums with a cover, gasket, bolt-ring closure. Once filled, the cover, with gasket, should be secured to the drum by securing the bolt-ring closure. Closure instructions are provided for all DOT specification containers supplied by Veolia. Veolia reserves the right to refuse pickup of material that is improperly packaged or is offered in damaged packaging. A callout fee will be assessed and the pickup will be re-scheduled once the material is re-packaged by the customer.
6. Information needed to arrange the pickup of ballast include the physical location of the ballast (On a loading dock?), whether or not the truck will need a lift-gate, whether or not a drum hand-cart will be needed and pickup hours.

Labeling:

The labels required for each container of lamp ballast will be dependent on the type of ballast within the container. While in storage prior to shipment, the containers should be marked with, generator name, generator address and a description of the contents of the container. Depending on the state in which you are located additional markings and labels may be required for PCB lamp ballast. For transport the containers must also be marked and labeled according to DOT regulations. The Ballast Appendix contains additional information on marking and labeling.

Types of Ballast



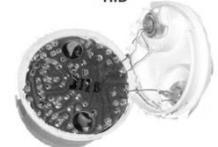
Magnetic



Electronic



HID



CFL



Electronic Waste Packaging Guidelines

The procedures outlined in this document must be used to store and prepare electronic waste for recycling. Questions regarding this document should be directed to customer service, toll-free at 1-800-556-5267. All precautions should be taken to eliminate leaking ballast. Monitors/CRTs contain leaded glass and care should be taken not to break or crush the glass in order to minimize lead exposure. Veolia recommends the following packaging guidelines.

General Packaging Guidelines for Electronic Waste:

1. Carefully put individual monitors/CRTs, or other electronics in cardboard boxes and place on a pallet. Do not stack pallet higher than four feet (4'). When the pallet is full, secure by shrink wrapping the boxes to the pallet; OR:
2. Carefully place monitors/CRTs, or other electronics into a cubic yard box (e.g. "Gaylord") and tightly pack in an orderly fashion; OR:
3. If monitors/CRTs or other electronics are similar in size, pack evenly on a pallet and separate each layer with a piece of cardboard. Do not stack pallet higher than four feet (4'). Secure units to the pallet by shrink-wrap.



Monitors



PC and Components

Labeling:

Electronic wastes and/or CRTs are classified as universal waste in certain states and must be labeled accordingly. In other states, the electronic waste will be classified as an exempt recyclable material and should be labeled to identify the contents of the container as a best management practice.

Broken CRTs are also subject to additional labeling. In most states, broken monitors must be marked as:

- "Used cathode ray tube(s)-contains leaded glass" or
- "Leaded glass from televisions or computers." and
- "Do not mix with other glass materials."

Storage of Electronic Waste:

Electronic waste and CRTs are subject to speculative accumulation limits. As such, all electronic waste and CRTs should be recycled within a year of being determined to be a waste. To demonstrate the storage time, mark all containers with an "Accumulation Start Date" (the beginning date the electronics or CRTs were stored for disposal). All electronic waste should be stored indoors, protected against the elements. Wet packages are subject to additional handling fees.



Equipment

Breakage:

Broken monitors are subject to additional regulation and may be considered hazardous waste in your state. Prior to shipping, contact customer service toll-free at 1-800-556-5267 for further assistance.

Available Veolia Electronics Containers:

Containers can be provided by Veolia. Please contact customer service toll-free at 1-800-556-5267 for additional details. Additional packaging may be available.

SKU	Type	Dimensions	Capacity
Supply-011	Cubic Yard Box*	36"x36"x36"	1100 lbs
Supply-021	FlexPak Box*	36"x36"x36"	1100 lbs
Supply-094	Cubic Yard Box	36"x36"x36"	1100 lbs

* UN/DOT approved

How to Palletize Electronics Waste:

Palletizing electronic waste correctly decreases costs by optimizing truck load capacity. Pallets should be used to electronic waste and aid truck loading with the availability of a fork lift and loading dock. One cubic yard box can be placed on a pallet at a time. If stacking like monitors, pack evenly on a pallet and separate each layer with a piece of cardboard. Do not stack pallet higher than four feet (4'). Secure units to the pallet by using sufficient shrink-wrap not only to secure the material to the pallet but to prevent the load from shifting or collapsing during transport.

Veolia ES Technical Solutions, L.L.C.

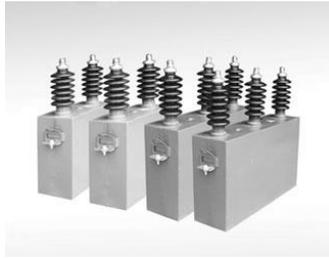
Environmental Solutions and Services

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Capacitor Packaging Guidelines

Large Capacitors



Composition: A capacitor is a passive two-terminal electrical component used to store energy in an electric field. The forms of capacitors vary widely, but all contain at least two electrical conductors separated by a dielectric (insulator). Most large capacitors consist of metal foils separated by a thin layer of insulating film. Prior to 1979, capacitors contained PCB oil as a dielectric fluid.

Hazards: Capacitors may retain a charge long after power is removed from a circuit; this charge can cause dangerous or even potentially fatal shocks or damage connected equipment.

US DOT Description:

PCB Containing Capacitors

Proper Shipping Name	Polychlorinated Biphenyls, liquid
Hazard Class	9
Identification Number	UN2315
Packing Group	III*

* When transported by highway or rail, PCBs are reclassified as Packing Group III in accordance with Special Provision 140

Non-PCB Containing Capacitors

Proper Shipping Name	Non-DOT regulated
Hazard Class	N/A (None)
Identification Number	N/A
Packing Group	N/A

US DOT Packaging Requirements:

49 CFR 173.21 Forbidden Materials

(c) Electrical devices, such as batteries and battery-powered devices, which are likely to create sparks or generate a dangerous evolution of heat, unless packaged in a manner which precludes such an occurrence.

Although this section of the regulations references batteries, capacitors do have the potential to store sufficient quantities to pose a hazard in transport. As such, large capacitors (>10 lb. each) must be transported as follows.

- PCB containing capacitors must be packaged in DOT specification containers unless specification packagings are impractical. If specification packaging are impractical, non-specification packaging may be used or the item itself may be considered the packaging provided it meets the general packaging requirements of the hazardous material regulations. When the capacitors themselves are the package, the capacitors must be secured to pallets adequate to support the weight of the capacitors.
- Capacitors must be transported in a discharged state.
- Each large capacitor must be shunted or grounded. This is accomplished by using a conductor to connect the terminals or connecting the terminals to a ground.

US EPA Regulations: As noted above capacitors manufactured prior to 1979 contain PCBs and must be managed in accordance with the TSCA regulations. Each PCB article must be marked with the M_L marker. PCB articles transported for disposal must be accompanied by hazardous waste manifest that includes the serial number of the article or container number if it is a PCB article container and the out of service date for the article. If multiple articles or article containers are listed on the same manifest, a continuation page must be included with the manifest noting the serial/container numbers and out of service dates.



Small Oil Filled Film Capacitors



Composition: are the most commonly available of all types of capacitors, consisting of a relatively large family of capacitors with the difference being in their dielectric properties. Oil filled film type capacitors are available in capacitance ranges from as small as 5pF to as large as 100uF depending upon the actual type of capacitor and its voltage rating. Film capacitors also come in an assortment of shapes and case styles. Prior to 1979, capacitors contained PCB oil as a dielectric fluid.

Hazards: Capacitors may retain a charge long after power is removed from a circuit; this charge can cause dangerous or even potentially fatal shocks or damage connected equipment.

US DOT Description:

PCB Containing Capacitors

Proper Shipping Name	Polychlorinated Biphenyls, liquid
Hazard Class	9
Identification Number	UN2315
Packing Group	III*

* When transported by highway or rail, PCBs are reclassified as Packing Group III in accordance with Special Provision 140

Non-PCB Containing Capacitors

Proper Shipping Name	Non-DOT regulated
Hazard Class	N/A (None)
Identification Number	N/A
Packing Group	N/A

US DOT Packaging Requirements:

Capacitor manufactured prior to 1979 may contain PCBs in a concentrated form. As such, a container of capacitors may exceed the reportable quantity (1 pound) and be regulated as a hazardous material when transported by highway. When transported by air or water,

PCB containing small capacitors must be packaged in DOT specification containers rated for packing group III when transported by highway or rail.

US EPA Regulations: As noted above capacitors manufactured prior to 1979 contain PCBs and must be managed in accordance with the TSCA storage, manifesting and disposal regulations. However, in accordance with 40 CFR 761.60(b)(2) small capacitors that are generated for disposal by any person other than a manufacturer of small capacitors are exempt from the disposal and manifesting requirements of 40 CFR 761. Small capacitors are defined as those capacitors that contain less than 3 pounds of dielectric fluid. As a general rule any capacitor that is less than nine pounds gross weight will meet this definition. Although exempt from EPA regulation, these capacitors may be subject to state hazardous waste rules.



Ballast Appendix

Federal Regulations

TSCA stands for the “Toxic Substance Control Act”

Please note the following general information regarding lamp ballasts and the TSCA regulations:

- Lamp ballasts are devices that control the flow of electricity to fluorescent and HID lamps.
- Ballasts contain a capacitor, and a transformer. Older lamp ballasts also contain an asphalt potting compound. The potting compound is the material that holds the components of the ballast in place and provides insulation for the electrical components.
- The capacitors within the ballasts contain less than 3 pounds of dielectric fluid and are defined as small capacitors by EPA and are exempt from TSCA regulation regardless of PCB content.
- Any ballast that is leaking PCB dielectric fluid is subject to TSCA regulation.
- Ballasts manufactured before July 2, 1979 contain PCBs in the capacitor and may contain PCBs in the asphalt potting compound.
- If the manufacture date is unknown and the ballast is not marked “No PCBs”, the ballast should be assumed to have been manufactured prior to July 2, 1979.
- Ballasts that contain greater than 50 ppm PCBs in the potting compound are regulated by TSCA.
- The generator must determine if their ballasts are TSCA regulated, either through generator knowledge or testing.
- In order to reduce long-term environmental liability and preserve natural resources, all ballasts should be recycled or destroyed at a TSCA permitted incineration facility. Improper disposal, and release of PCB’s into the environment, may result in the generator of the waste being financially responsible for clean-up under the Superfund rules.

Please note the following guidelines for generators:

TSCA regulated PCB Ballast:

- Must transport on a Hazardous Waste manifest. If the generator stores ballasts the ballasts for greater than 30 they must have and use a generator EPA ID number.
- Each container must have a unique identification number (per drum) assigned by the generator and an out-of-service date (the date the first ballast in the drum was removed from service).
- Must be stored and transported in a DOT approved container. DOT approved containers will be marked with a UN specification marking.
- Each container must be marked with the TSCA PCB marker/M_L label.
- If stored for greater than 30 days, each container must be stored in a designated PCB storage area. The requirements for a PCB storage area are attached.
- TSCA regulated PCBs must be destroyed within one year of the out-of-service date. To ensure compliance, PCBs should always be shipped less than 9 months after the out-of-service date.
- Weights must be recorded and reported in kilograms.
- Must be described on the manifest using the shipping name of “Polychlorinated biphenyls, solid, 9, UN 3432, PGIII”.

Non TSCA regulated PCB Ballast:

- Transported on a Bill of Lading, rather than a Hazardous Waste Manifest (no EPA ID number required of generator), and may be transported by a common carrier
- No unique drum number, serial number, or out of service date required
- No secondary containment necessary
- No storage time limitation
- Must use proper DOT shipping containers and shipping name referenced above.

Non PCB Ballasts:

- Ballasts manufactured after July 2, 1979 may be assumed to be non-PCB
- Not TSCA or RCRA regulated
- Transported on a Bill of Lading, rather than a Hazardous Waste Manifest (no EPA ID number required of generator), and may be transported by a common carrier

State Regulations



The following states regulate PCB containing materials under their hazardous waste regulations.

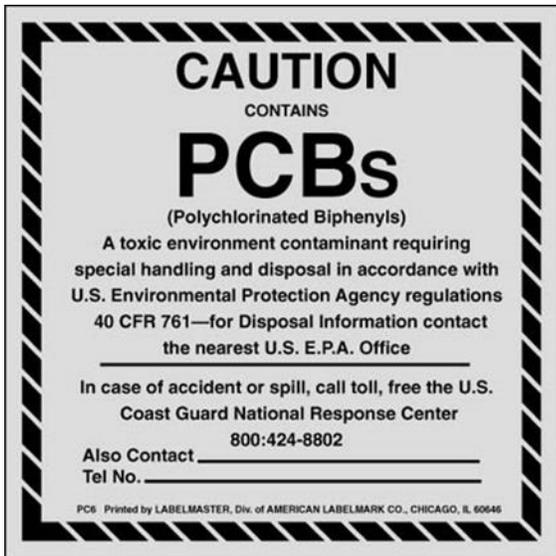
State	Waste Code	State	Waste Code
California	261	Minnesota ⁵	MN03
Connecticut ⁴	CR01	New York (500+ ppm) ³	B005
Maine ¹	M002	New York (50-499 ppm) ³	B004
Maryland (500+ ppm)	M001	Rhode Island	R007
Massachusetts	MA02	Vermont ¹	VT01
Massachusetts ²	MA99	Washington	W001

1. These states have included fluorescent lamp ballasts under their Universal Waste Rules and these waste codes only apply to leaking ballasts.
2. This waste code applies to all ballasts managed under the Massachusetts guidance.
3. These waste codes do not apply to PCB small capacitors, therefore, PCB lamp ballast are exempt from regulation.
4. Waste code applies to manifested shipments.
5. Minnesota regulations contain provisions which allow minimal quantities of hazardous waste to be excluded from the manifesting requirements.

Notes:

1. Regardless of type, all fluorescent lighting ballasts received by Veolia are properly treated and decontaminated at fully licensed facilities. See chart below.
2. Because the **small capacitors** within the ballasts are considered to be **exempt from TSCA regulation**, some generators consider the entire ballast to be exempt from TSCA regulation. This determination should technically be made by testing the ballasts or through generator knowledge of the ballasts. Others tend to be more conservative and consider the ballasts to be **TSCA regulated** because of the potential for PCB's in the potting compound. However, keep in mind the above mentioned guidelines **MUST** be followed in this situation, and Veolia can assist in providing proper labeling and shipping documentation.

Sample TSCA PCB Marker/M_L Label





PCB Storage Area Requirements

- Adequate roof and walls to prevent rain water from reaching the stored PCBs and PCB Items;
- An adequate floor that has continuous curbing with a minimum 6 inch high curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container or 25 percent of the total internal volume of all PCB Articles or PCB Containers stored there, whichever is greater. PCB/radioactive wastes are not required to be stored in an area with a minimum 6 inch high curbing. However, the floor and curbing must still provide a containment volume equal to at least two times the internal volume of the largest PCB Container or 25 percent of the total internal volume of all PCB Containers stored there, whichever is greater.
- No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area;
- Floors and curbing constructed of Portland cement, concrete, or a continuous, smooth, non-porous surface as defined at §761.3, which prevents or minimizes penetration of PCBs.
- Not located at a site that is below the 100-year flood water elevation.
- Marked as required in subpart C §761.40(a)(10) (marked with the PCB M_L label).
- No item of movable equipment that is used for handling PCBs and PCB Items in the storage units and that comes in direct contact with PCBs shall be removed from the storage unit area unless it has been decontaminated as specified in §761.79.
- All PCB Items in storage shall be checked for leaks at least once every 30 days. Any leaking PCB Items and their contents shall be transferred immediately to properly marked non-leaking containers. Any spilled or leaked materials shall be immediately cleaned up and the materials and residues containing PCBs shall be disposed of in accordance with §761.61. Records of inspections, maintenance, cleanup and disposal must be maintained in accordance with §761.180(a) and (b).
- Any container used for the storage of liquid or non-liquid PCB waste shall be in accordance with the requirements set forth in the DOT Hazardous Materials Regulations (HMR) at 49 CFR parts 171 through 180. PCB waste not subject to the HMR (i.e., PCB wastes at concentrations of <20 ppm or <1 pound of PCBs regardless of concentration) must be packaged in accordance with Packaging Group III, unless other hazards associated with the PCB waste cause it to require packaging in accordance with Packaging Groups I or II. For purposes of describing PCB waste not subject to DOT's HMR on a manifest, one may use the term "Non-DOT Regulated PCBs."

PCB Items shall be dated on the item when they are removed from service for disposal. The storage shall be managed so that the PCB Items can be located by this date.



**For Battery Packaging
Guidelines, Please See
Separate Document On
The RecyclePak Website.**

Resourcing the world

VEOLIA NORTH AMERICA
100 Federal St, 3rd Floor,
STE 301
Boston, MA 02110
www.veolianorthamerica.com