



Rutgers Environmental Health and Safety (REHS)

Program Name:	Management of Empty Drums and Large Containers		
Responsible Executive:	Executive Director of REHS		
Adopted:	August 6, 2002	Reviewed/Revised:	October 9, 2020

1. Program Statement

It is the policy of Rutgers University to provide a safe and healthful workplace for faculty, staff and students and to protect and preserve the environment in which we operate. Proper management of large empty chemical containers helps us achieve the goal of protecting health and the environment.

2. Reason for Program

The purpose of this program is to ensure that used containers are properly and safely managed to prevent injury and environmental contamination. The program is intended to comply with the following Rutgers Policy and EPA regulation:

- [Rutgers Hazardous Waste Disposal Policy](#)
- *Resource Conservation and Recovery Act* (40 CFR 260 through 273)

3. Who Should Read this Program

This program applies to all Rutgers faculty, students and staff who handle large containers ranging in size from >5 gallons up to 55 gallons. Containers may vary in composition and include metal, fiber and plastic drums.

4. The Program

This program sets forth best management practices for properly managing large empty used chemical containers.

This program does not apply to:

- Small containers (≤5 gallon capacity) – these containers can be placed in the general trash after contents have been completely emptied and labels defaced
- Recyclable glass, aluminum and plastic beverage and food containers – these containers can be placed in the recycle receptacles located in each building throughout the University.

I. Roles and Responsibilities

A. Facilities/Housing/Dining Departments

- 1) Properly manage and/or dispose of large empty used containers and drums in accordance with the procedures outlined in Section III.

- 2) Always discard large empty containers and drums properly and NEVER offer them to students, staff or the community for any other use.

B. Rutgers Environmental Health and Safety (REHS)

- 1) Pick up and properly dispose of empty large containers or drums contaminated with acutely hazardous waste.
- 2) Provide advice and guidance to Facilities/Housing/Dining personnel on proper empty container management and disposal as needed.
- 3) Properly manage and/or dispose of large empty used containers and drums at the Environmental Services Building on Busch campus in accordance with the procedures outlined in Section III.

II. Definitions

Used Containers Any empty shipping containers that formerly contained a chemical or petroleum product. The containers covered in this program include metal, fiber or plastic drums with a volume greater than 5 gallons up to 55 gallons.

III. Procedures

A. Facilities/Housing/Dining Personnel

- 1) Whenever possible, purchase raw materials from suppliers who are willing to take back large empty containers for reuse.
- 2) Remove or empty all materials from the container by using commonly employed methods such as pumping and pouring. Containers that are not completely empty will not be picked up for disposal.
- 3) [Request a pickup of hazardous waste](#) for large empty containers that previously held [acutely hazardous materials](#) (designated as P-listed waste). Do not attempt to rinse or otherwise decontaminate or discard these containers.
- 4) [Request a pickup of hazardous waste](#) for empty containers that are contaminated with residues that would be classified as hazardous waste if such residues cannot be easily removed.
- 5) Deface chemical labels by placing an "X" across the label using a thick indelible ink marker or similar method.
- 6) Secure lids and/or bungs on the containers or drums before placing them into the appropriate storage area.
- 7) Store empty large containers or drums in a secure area protected from severe weather conditions (e.g. inside a building, under a roofed structure, outside with a tarp). This will prevent stormwater contamination.

- 8) Store empty large containers on their side with all openings sealed and chocked in place to prevent rolling or other movement.
- 9) Consult with REHS to determine if the empty container is suitable for REHS to reuse for hazardous waste collection.
- 10) Each department is responsible for making arrangements with waste haulers, metal scrap vendors or drum reconditioning companies to properly dispose or reclaim large empty containers.