

News You Can Use

Empty Containers: EPA vs. DOT

One important aspect of shipping hazardous materials is determining whether an otherwise seemingly empty drum is regulated by the EPA or DOT. This question comes up quite often, and we would like to help clarify the difference between the EPA definition and the DOT definition of an empty drum.

The EPA's definition is designed to protect human health and the environment. According to [40 CFR 261.7](#), a container that previously contained non-acute hazardous wastes are empty if they meet any of the following requirements:

- Remove all waste that can be removed using common methods (pouring, pumping, and aspirating).
- Less than 1 inch of residue remains, or
- No more than:
 - 3% for non bulk containers
 - 0.3% remains for bulk containers (119 gallons or greater)
- A container that has held a hazardous waste that is a compressed gas is empty when the pressure in the container approaches atmospheric pressure.

A container that previously contained acute ("P" listed) hazardous wastes are empty if they meet any of the following requirements:

- Triple rinse to make empty for disposal as an empty.

- Use a volume of diluent equal to at least 10% of the total capacity of the container.
- Collect rinse solution and dispose of hazardous waste as "P" listed waste.

DOT's definition is designed to protect life and property during transportation in commerce. According to [49 CFR 173.29](#), a container is considered empty if ALL of the following requirements are met:

- Its residue has been removed, it is purged of vapor and it does NOT pose a DOT hazard.
- Hazardous materials communications (all labels) have been removed.
- Any remaining residue is neither an EPA hazardous waste or marine pollutant.
- No substances remain in excess of its reportable quantity.

If you have additional questions, feel free to contact us, your local Enviroexperts at (301) 309-0475.



Client Questions Answered

Q. Is there a reporting requirement for Special Medical Waste?

- A. Referencing the [Code of Maryland Annotated Regulations \(COMAR\) 26.13.12.06B](#) "The Secretary, as the Secretary deems necessary, may require generators to furnish... reports concerning the quantities and disposition of special medical wastes." This means that the Maryland Department of Environment reserves the right to request reports on special medical waste.



Q. Do we need a permit to use alcohol in our laboratories?

- A. There are certain qualifications that determine whether or not you need to apply for a Specially Denatured Spirits (SDS) permit through the **Alcohol and Tobacco Tax and Trade Bureau (TTB)**. Some include, the size of your largest single container of alcohol, the amount used within any given year, and the reagent alcohol primarily used. If you are unclear about whether your lab requires a permit please contact your local Enviroexperts for more information.



Have you heard this:

"Despite all of the damage we have caused the environment, most of it is reversible. We can restore habitats and return species to them, clean rivers, renovate buildings, replenish the topsoil, and re-plant forests. However, these activities do not relieve the worst symptoms of the damage. We still have to fix the source of these problems, us and our vision that we must progress."

- Author unknown
[Click for reference](#)

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Message from our Officers

As our company grows, the need to strengthen our core values has become a priority. We are excited to announce the release of our redefined Mission Statement, Vision, and Core Values.



Mission:

Our Mission is to provide cost effective and balanced environmental solutions and to build a company that the world respects.

Vision:

To be the undisputed leading provider of waste management and environmental services.

Core Values:

Excellence – We strive for excellence in customer service, motivation and continuous improvement in all that we do to increase satisfaction and employee happiness. Learning, growing, and applying our knowledge to innovation increases our capacity and reputation for being the best in the industry. We envision a world where our customers are showered with technical expertise to provide innovative solutions that improve the quality of the environment and satisfy their bottom line.

Mutual Respect – Part of what embodies mutual respect is communication, inclusion and teamwork. We embrace and recognize traits that make us and our clients unique to foster an atmosphere that promotes and celebrates individual and collective achievement. We will provide customer service with our focus on clear and open lines of communication to achieve the best results.

Stewardship – We are stewards responsible for taking care of our clients and the environment. We hold a high standard of service using the highest level of competency to properly handle our clients' hazardous waste which, in turn, will keep them in compliance with regulations and the environment safe. We continuously strive to be mindful of the environmental effect of the work we do and for environmental sustainability, protecting the environment **one client at a time**.

Integrity – Integrity and ethics are the internal system of principles that drive us to do what is right and the external action that is driven by it. The relationship between these two words is dynamic where they strengthen and reinforce each other. We instill these values to gain the trust and build an unrivaled partnership with our clients.

Shobhana Sharma
President & CEO

Angela Sharma
Vice President



Have you met...



Will Medrano

Will has joined EMSI as a Hazmat

Technician. He comes to us with 6 years of previous experience working as a radiation technician. We are happy to have him on our team.



Brandon Welbourn

Brandon is our newest Hazmat

Technician. He graduated from Florida State University with a degree in physical geography & geology. He also served in the army where he was trained in environmental safety and sampling of potentially hazardous materials. His most recent experience includes working as an environmental specialist. We are happy to have him as part of our EMSI family.

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