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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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CONTAINERS FOR SAFE AND ECONOMICAL STORAGE, TRANSPORT,
AND DISPOSAL OF HAZARDOUS WASTE

Honorable Bill Alexander
Member, United States
House of Representatives
Gathings Building, Room 211-A
615 South Main
Jonesboro, Arkansas 72401

Dear Mr. Alexander,

This is in response to your letter of October 21, 1985, requesting assistance for your constituent, Mr. Jack Hendricks, President of Crown Rotational Molded Products Inc., regarding the development of a container for the safe and economical storage, transport, and disposal of hazardous waste.

While EPA does not directly regulate the manufacturing of containers, we do regulate the storage of hazardous waste in containers (40 CFR, Part 264, Subpart 1). A copy of these standards is enclosed. These performance standards require that hazardous waste not be stored in containers that leak or are incompatible with the wastes. Anyone who stores hazardous waste in containers must obtain a RCRA permit and comply with these standards.

In many cases hazardous wastes are stored in containers made to meet Department of Transportation (DOT) standards. For waste handling and safety reasons, it is frequently cost effective for a generator to store his hazardous waste in the same container in which it will be transported and, often, ultimately disposed. As a result, most containers storing hazardous waste are ultimately slated for transfer to a disposal or treatment facility (e.g., landfill, incinerator). EPA has concluded that containers that meet DOT standards for the transportation of containerized materials (49 CFR Part 173) are also acceptable from an environmental protection perspective for the storage of hazardous waste.

If Mr. Hendricks is interested in pursuing EPA assistance with his research project, his first step in the process of seeking a grant is to submit an application for Federal assistance. Mr. Hendricks can obtain the necessary forms from:

Grants Operations Branch (PM-216)
Grants Administration Division
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

However, it may be to Mr. Hendricks benefit to discuss the technical aspects of his research project with EPA's Office of Research and Development prior to submitting any paperwork to the Grants Administration Division. such a discussion would ensure that the salient technical points are addressed in Mr. Hendrick's application and might also give him an indication of the merits of his proposal. If Mr. Hendricks is interested, he should contact:

Grants Operations Branch (PM-675)
Office of Exploratory Research
Office of Research and Development
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460
Phone: 202/382-7899

Since regulations addressing container design specification are primarily within the realm of DOT, Mr. Hendricks may also want to contact DOT regarding his proposal for hazardous waste containers. If you need further information on this topic from EPA, please call Mr. William Kline in the Office of Solid Waste at (202) 382-7917.

Sincerely,

J. Winston Porter
Assistant Administrator

Enclosures

bcc: Don Carey