

The Lost Art of Lab Packing March 23, 2022



24th California Unified Program Annual Training Conference March 22, 23, 24, 29, 30, 31 - 2022

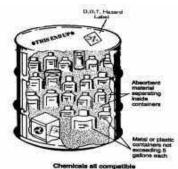
OUTLINE

- Introduction
- Safety
- Regulatory Infrastructure
- Field Chemistry
- Supplies

- Lab Packing Recommendations
- Exercises
- Peripheral Operations
- Project Review
- Summary



What is lab packing?



- Lab packing (the verb) is the process of packing relatively small chemical items (e.g., 5.3 gallons or less), which are designated for disposal, into the same outer packaging.
- DOT-regulated lab packed items must have the same primary **DOT** hazard class.
- Lab pack items must also be chemically compatible.

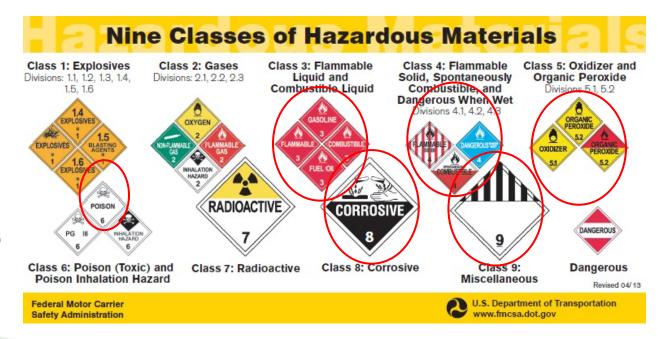


 A lab pack (the noun) is simply an outer packaging holding relatively small, chemicallycompatible waste items; all of which share the same primary DOT-hazard class (where applicable).



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There are nine
 DOT hazard
 classes, we will
 primarily focus on
 those hazard
 classes and
 divisions that are
 eligible for the lab
 pack exception





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- Contrary to what the name indicates, lab packing operations are not limited to laboratory settings.
- Chemicals can be "lab packed" at...
 - Auto repair facilities
 - Hospitals
 - Household hazardous waste collection facilities (HHW)
 - Manufacturing facilities
 - Public works facilities
 - Refineries... etc... in addition to Research and Development facilities and in academia.







 Notwithstanding the key safety, technical, and regulatory aspects related to this topic (all of which will be covered in this presentation), one point must be communicated without equivocation:



LAB PACKING IS FUN!!!!





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HISTORICAL INFORMATION:

- I joined LLNL in 1993 as a lab pack operations technologist.
- I began supervising the operation by 1996
- I was promoted to managerial status in 1998 (as the lab pack operations team leader)



HISTORICAL INFORMATION:

- I joined the LLNL Permits and Regulatory Affairs Group (PRAG) in 2001. (PRAG serves as onsite EH&S consultants).
- I retired from LLNL in 2006.



FIRST POLL QUESTION:

 When was the last time that I participated in a "hands on" lab packing operation, outside of a classroom?



FIRST POLL QUESTION ANSWERS:

- In 1997, just before the promotion?
- In 1998, just before joining PRAG?
- In 2006, just before retiring?
- In July of 2020? or
- In July of 2022?















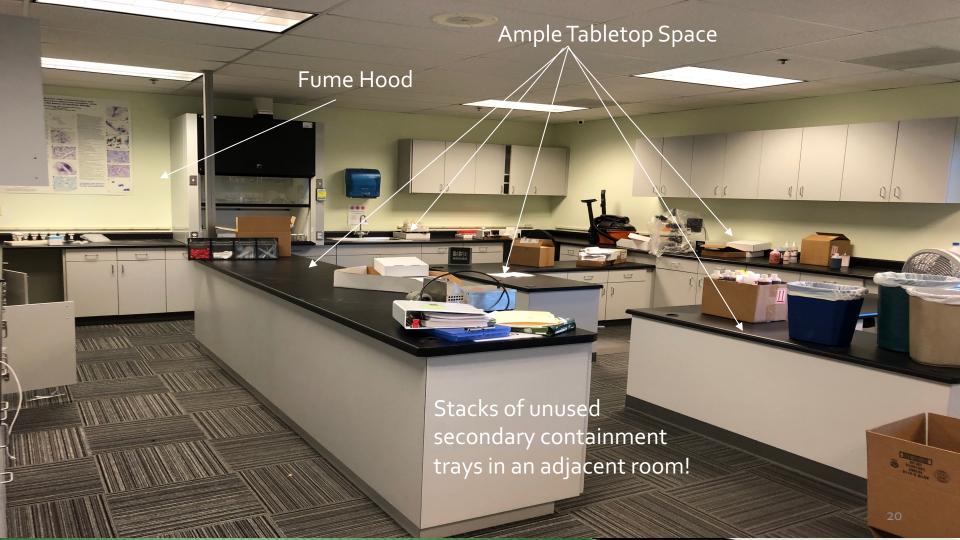












MORE TO COME ON THIS PROJECT LATER IN THE PRESENTATION





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WELCOME TO DISNEYLAND

(A lab packers haven!)

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- Chemical Hazards
- Physical Hazards
- Hazard Controls
 - Engineering
 - Administrative
 - > SOPs
 - > Training
 - PPE





Chemical Hazards

Lab packing, by definition, involves handling a variety of chemicals, the extent to which depends greatly on where the work is done and the size of the operation.



Chemical Hazards:
If you are at a refinery, you may encounter....

- Acids,
- Fuel additives
- Bases,
- Lubricants
- Catalyst
- Petroleum distillates

Fuels





Chemical Hazards: If you are at an autobody or auto repair shop, you may encounter...

- Aerosols
- Lubricants
- Coolants Paints
- **Electrolyte** Thinners

Epoxies





Chemical Hazards:
If you are at medical facility,
you may encounter...

- Non-RCRA pharmaceuticals
- RCRA pharmaceuticals
- Radiologic pharmaceuticals
- Biohazardous wastes



NOTE: These items represent the types of hazards that may be encountered, not necessarily materials designated for lab packing.



Chemical Hazards: If you are at an R & D facility or a University, the list is unending....

- Air & water reactive substances
- Carcinogens, mutagens, teratogens
- Corrosive materials
- Explosives
- Gas lecture bottles



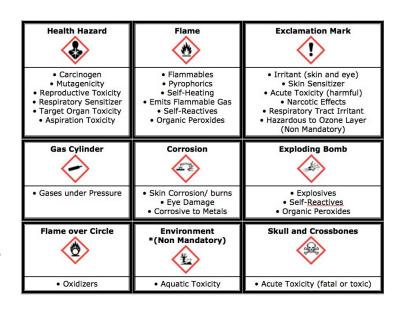
- Oxidizing agents
- Organic peroxides
- Poisons
- Self reactive
- Sensitizers



Chemical Hazards:

The chemical hazards posed will be unique to the type of chemical handled....

CAUTION: Multiple hazard is the rule (rather than the exception)!!!!





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Chemical Hazards:

EXAMPLE:

Concentrated sulfuric acid exhibits all of the following hazardous properties:

- Corrosive
- Water reactive
- Oxidizing
- The mists of which are carcinogenic





Chemical Hazards:

EXAMPLE:

Carbon monoxide exhibits all of the following hazardous properties:

- Chemical asphyxiant
- Flammable gas
- Teratogenic





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Chemical Hazards:

EXAMPLE:

1,4-Dioxane exhibits all of the following hazardou properties:

- Flammable
- Mutagen
- Peroxide former





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Chemical Hazards:

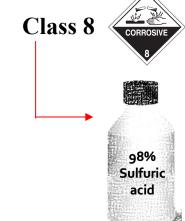
EXAMPLE:

Sodium azide exhibits all of the following hazardous properties:

- Poisonous (DOT 6.1 PG II)
- Mutagen
- Explosive when heated or contaminated







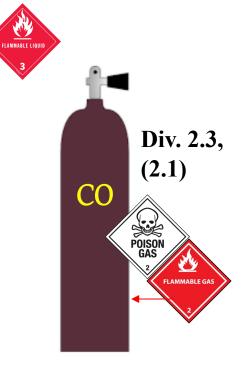
Chemical Hazards:

It is important to note that the multiple hazards exhibited by these materials are not direct indicators of how they will be classified for shipment.



Class 3

1,4-Dioxane

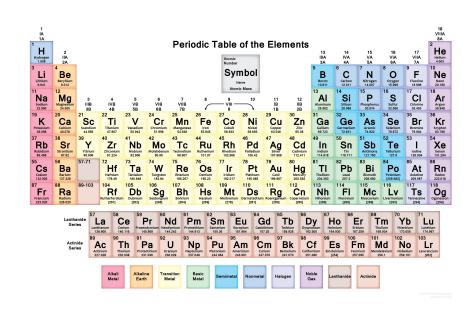




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Chemical Hazards:

It can also be beneficial to associate nomenclature with hazards exhibited by the specified chemical families





					D00, D00,							
					IB4, IP1,							1
					N34, T9,							1
Calcium carbide	4.3	UN1402	1	4.3	TP7, TP33	None	211	242	Forbidden	15 kg	В	52
					A1, A19,							
Calcium cyanamide with more than					IB8, IP4,							
0.1 percent of calcium carbide	4.3	UN1403	III	4.3	T1, TP33	151	213	241	25 kg	100 kg	Α	52
				ace stores								
Calcium hydride	4.3	UN1404	1	4.3	A19, N40	None	211	242	Forbidden	15 kg	E	52
					A1, A19,							
					IB8, IP4,							52, 85,
Calcium manganese silicon	4.3	UN2844	III	4.3	T1, TP33	151	213	241	25 kg	100 kg	Α	103
					A8, A19,							
Calcium phosphide	4.3	UN1360	1	4.3, 6.1	N40	None	211	242	Forbidden	15 kg	E	40, 52, 85
					A19, IB7,							
					IP2, T3,							52, 85,
Calcium silicide	4.3	UN1405	II.	4.3	TP33	151	212	241	15 kg	50 kg	В	103
									25 kg			
Cells, containing sodium	4.3	UN3292	II.	4.3		189	189	189	gross	No limit	Α	
					A1, IB7,							
					IP2, T3,	1						
Cerium, turnings or gritty powder	4.3	UN3078	II.	4.3	TP33	151	212	242	15 kg	50 kg	E	52
					A7, A19,							
				N/ 1000	IB4, IP1,							
Cesium or Caesium	4.3	UN1407	1	4.3	N34, N40	None	211	242	Forbidden	15 kg	D	52
					200000 00 00000							
20 a 20					A2, T14,							84100 AVECTOR (1777)
Chlorosilanes, water-reactive,	1000000		100	25 2022 4945 3650	TP2, TP7,			0.00	10.00 MARKS NO.00			21, 28, 40,
flammable, corrosive, n.o.s	4.3	UN2988	1	4.3, 3, 8	TP13	None	201	244	Forbidden	1 L	D	49, 100
					A2, A3,	1						
					A7, N34,							
	, -				T14, TP2,						1	21, 28, 40,
Ethyldichlorosilane	4.3	UN1183		4.3, 8, 3	TP7, TP13	None	201	244	Forbidden	1 L	D	49, 100

Chemical Hazards:

Oxidizing agents exacerbate fires and cause fires when in contact with organic material.

Oxidizers also react with reducing agents (e.g., metal powders, cyanides, sulfides, sulfites).





Chemical Hazards:



Examples of oxidizing agents include but are not limited to the following:

- **Bromates**
- Chromates
- **Perborates**

Peroxides

- **Bromites**
- **Chromites**
- Perchlorates Persulfates

- **Chlorates**
- **Nitrates**
- Periodates

- Chlorites
- **Nitrites**

Permanganates



Chemical Hazards:

Examples of oxidizing acids include but are not limited to the following:

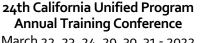
- **Bromine**
- **Chromic acid**
- **Chromium trioxide**
- **lodic** acid

- Nitric acid
- Perchloric acid
- Potassium and sodium dichromate











Chemical Hazards:

Chemicals such as methyl ethyl ketone peroxide or dibutyl peroxide are organic peroxides and are shipped inhibited for stability





Chemical Hazards:

 Other chemicals, themselves, are not organic peroxides, but can form organic peroxide crystals.



- Uninhibited organic peroxides are heat, shock, and friction sensitive.
- These materials can detonate from performing an action as simple as removing a bottle cap.



Chemical Hazards:

Examples of peroxide forming (a.k.a. peroxidizable) materials include, but are not limited to...



- **Ethers** (light and medium molecular weight)
- Potassium metal
- Potassium and sodium amide
- Tetrafluoroethylene

- Cumene
- Cyclohexene
- 1,4-Dioxane
- Tetrahydrofuran

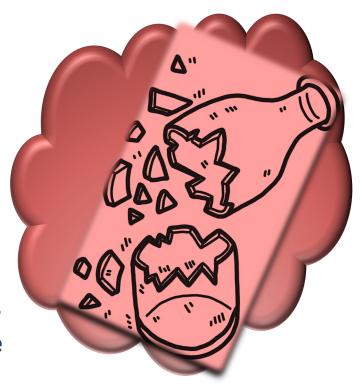


Chemical Hazards:

There are chemicals that dangerously polymerize when heated or otherwise initiated. Examples of polymerizable materials include, but are not limited to...

- Acrylic acid
- Ethyl acrylate
- Methyl methacrylate
- Styrene

- Vinyl acetate
- Vinyl chloride
- Vinyl pyridine



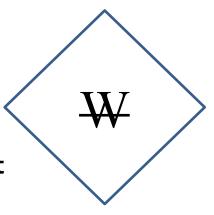


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Chemical Hazards:

The term "anhydrous" denotes substances without water; thus, adding water typically produces an exothermic reaction.

Similarly, the term "anhydride" applies to substances with only one molecule of water; adding water can also result in the generation of heat.





Chemical Hazards:



EXAMPLES:

- Aluminum chloride, anhydrous
- Ferric chloride, anhydrous
- Sodium sulfide, anhydrous (liberates H₂S gas)
- Acetic anhydride and
- Phosphoric anhydride (also known as phosphorus pentoxide)



Chemical Hazards:

Alkali and alkaline earth metals and their hydrides react violently with water.





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Chemical Hazards:

Many multi-halogenated inorganic compounds react violently with water and are acidic, such as...

- Antimony trichloride
- Bismuth pentafluoride
- Boron trichloride

- Phosphorus pentachloride
- Phosphorus tribromide
- Titanium tetrachloride





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Chemical Hazards:

Many alkyl, aryl, and other "-yl" halides are fuming water reactive acids, such as...

- Acetyl bromide
- Acetyl chloride
- Benzoyl chloride
- Phosphoryl chloride
- Sulfonyl fluoride
 - Thionyl chloride





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Chemical Hazards:

Other water reactive groups include...



- Amides
- Carbides (like calcium carbide)
- Isocyanates
- Phosphides
- Silane, silyl, siloxane compounds (many organo- chlorosilanes, like dimethyl chlorosilane, are acidic, flammable, and water reactive)





Chemical Hazards:

Lastly, concentrated mineral acids (and some bases), in general, react energetically with water... as one pseudo-poet, yet very wise person, once wrote...

"DO AS YOU OUGHTA, ADD ACID TO



_ //



Chemical Hazards:

While some multi-nitro organo compounds are dyes and/or mutagens, many are explosive. Examples of explosive materials include, but are not limited to...



- **HMX** (cyclotetramethylene-tetranitramine)
- **Nitrosoguanidine**
- **Pentaerythritol tetranitrate** (PETN)
- Picric acid (Trinitrophenol)

- **RDX** (1,3,5-Trinitro-1,3,5-triazine)
- **Tetranitromethane**
- **TNT** (Trinitrotoluene)

NOTE: Metal azides and metal fulminates are also explosive.



UNKNOWNS









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Chemical Hazards (Incompatibles):





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Acids	Synonyms/ Notes	Bases	Synonyms/ Notes
Aluminum chloride	Contained in antiperspirants; the anhydrous form reacts violently with water	Ammonia	Ammonium hydroxide
Battery acid	Sulfuric acid; "Oil of Vitriol"	Baking soda	Sodium bicarbonate
Hydrochloric acid	Muriatic acid	Potassium carbonate	Potash
Hydrofluoric acid	Contained in glass etch; called the "bone-seeking" acid; also reacts with vermiculite & other silica-based products	Caustic soda	Sodium hydroxide
Iron chloride	Also called ferric or ferrous chloride	Lime	Calcium oxide
Nitric acid	An oxidizing acid	Potassium hydroxide	Caustic potash
Phosphoric acid	Contained in colas (in low concentration)	Sodium meta-silicate	Contained in driveway cleaners
Tin chloride	Also called stannic or stannous chloride	TSP	Trisodium phosphate, Phosphoric acid trisodium salt 54

Oxidizers	Examples	Organics	Examples
Bromates	Ammonium nitrate (fertilizer);	Carbon-containing	Acetone,
Bromites	Hydrogen peroxide (≥8%);	substances that	Aerosols
Chlorates	Pool Disinfectants (e.g., calcium hypochlorite or	exhibit carbons unique binding	Alcohols,
Chlorites	sodium dichloroisocyanurate)	property.	Cardboard,
Chromates		(More on this later)	Fuels,
Chromites			Herbicides,
Nitrates			Motor oil,
Nitrites			Paints,
Perborates			Pesticides,
Perchlorates			Rice hulls
Periodates			Roundup,
Permanganates			Sawdust,
Peroxides			Solvents
Persulfates			Surfactants 55

Inorganic Oxidizing Acids	Synonyms/ Notes	Organic acids	Synonyms/ Notes
Bromine	Also toxic by inhalation	Acetic acid	Vinegar
Chromic acid	Contained in some inks, ceramic glazes, paints, and laboratory glass cleaners (i.e. "Chromerge")	Acetylsalicylic acid	Aspirin
Chromium trioxide	<i> </i>	Benzoic acid	Food preservative
Iodic acid	Lab reagent, used in some pharmaceuticals	Formic acid	Contained in fumigants and insecticides
Nitric acid	Lab reagent	Oxalic acid	Contained in some radiator cleaners
Perchloric acid	Lab reagent; used in electro- polishing and explosive manufacturing	Propionic acid	Mold inhibitor; wood chip preservative
Potassium dichromate	Also extremely toxic on contact with skin and by ingestion.	Stearic acid	Contained in soaps

Acids	Cyanides
Acids	Sulfides
Aqueous materials*	Water Reactives (e.g., hydrides, anhydrides, and anhydrous; -yl chlorides; sodium, potassium, and lithium metals)

Some chemicals within the same hazard category are incompatible

Oxidizers

Part A epoxies**

Reducing agents

cyanides....)

Part B epoxies

(e.g., metal powders, sulfites, sulfides,

Lab packers must also be aware of MATERIALS with which chemicals react:

Examples include:

- Ammonia with copper, brass, zinc, and galvanized metals.
- Hydrofluoric acid: Glass, all silica-bearing materials
- Hydrogen peroxide: Aluminum fittings
- Oxidizers: (including concentrated sulfuric acid) with rubber.
- Water reactives: Vermiculite



Chemical Hazards Exercise



Which chemical is incompatible with the others?

- Calcium nitrate
- Potassium nitrate
- Ammonium nitrate
- Sodium nitrite
- Potassium bromate

There are three incompatible chemicals in this drum.... Which are they?

- Oil of Vitriol
- Sulfuric acid
- Phosphoric acid, trisodium salt (TSP)
- Phosphoric acid
- Sodium sulfide
- Hydrochloric acid
- Muriatic acid
- 40% Ferric chloride solution
- Hydrocyanic acid, sodium salt (sodium cyanide)



Which chemical is found in frozen pizza?

Tetrachlorodibenzo dioxin (TCDD)

Sodium nitrite

Thionyl chloride

Phenol (crystalline)

Potassium arsenate (for bacterial control)

Are these two oxidizing pool disinfectants compatible? If so, why..., and if not, why not?

- Calcium hypochlorite (CaOCl)
- Sodium dichloroisocyanurate (C₃Cl₂N₃NaO₃)

Resources for Determining Compatibility

- SDSs (Please befriend "Sections 2, 10, & 14," hazards, reactivity, and transportation, respectively)
- NIOSH Pocket Guide to Chemical Hazards
 https://www.cdc.gov/niosh/npg/npgsyn-a.html#
- CAMEO

https://www.epa.gov/cameo



Resources for Determining Compatibility (cont.)

- Chemical Reactivity Worksheet
 https://www.aiche.org/ccps/resources/chemical-reactivity-worksheet
- Wiser database
 https://wiser.nlm.nih.gov/



Resources for Determining Compatibility (cont.)

- Brethericks Handbook of Reactive Chemical Hazards
- Farms Chemical Handbook
- Hawley's Condensed Chemical Dictionary
- Merck Index
- SAX Dangerous Properties of Industrial Substances



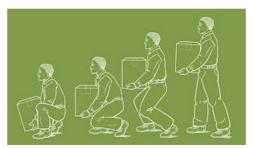


10-MINUTE BREAKTIME!



Physical Hazards

In addition to chemical hazards, lab packing poses a range of physical hazards to guard against, including, but not limited to the following:





Physical Hazards (cont.)

- Communication limitations (when respirators are worn)
- Drum handling (including pinch hazards posed by rigid metal drum rings)
- Lifting



Physical Hazards (cont.)

- Loading and unloading containers and supplies
- Sharps (broken glass, sharp edges)
- The unique hazards posed by the work environment.



Hazard Controls

Engineering:

- Ventilation systems
- Fume hoods (stationary and portable)
- Glovebags (can be used for remote handling small items)



Hazard Controls (cont.)

Administrative:

 A comprehensive standard operating procedure (SOP), which incorporates the specific expertise and resources offered by your business.



Hazard Controls (cont.)

Administrative:

- Training commensurate with the operation (NOTE: all "asterisked" entries are required)
- Respiratory protection* (if respirators will be worn)
- Incidental or emergency* spill response
 training (the latter will require "HAZMATTECH" training
 under the HAZWOPER Standard.)



Hazard Controls (cont.)

Administrative:

- Trained to the comprehensive SOP
- DOT Hazmat Employee training*
- Hazardous waste management*
- Either some college chemistry or field chemistry training obtained formerly or on-the-job



Hazard Controls (cont.)

NOTE:

Training is an integral component of in ensuring worker safety...and the California Labor Code (6400-6407) requires that employer provide and maintain a safe and healthful work environment for his or her staff.



Hazard Controls (cont.)

NOTE:

Additionally, HAZWOPER training can be useful, but is not required unless the work being performed at an uncontrolled hazardous waste, at a TSDF (where Section "P" applies), or when responding to a chemical emergency (where Section "Q" applies).



Hazard Controls (cont.)

PPE:

Lab pack typically involves wearing Level D and Level C PPE; the latter is worn when bulking or opening primary and outer containers.

It is recommended that the Level D ensemble include a disposal suit (e.g., a Tyvek or sleeve apron)



Hazard Controls (cont.)

PPE:

Thin nitrile gloves are typically worn for dexterity. It is recommended that you wear, at least, two pair.

Three pairs of thin nitrile gloves are better, however:

 One inner; one intermediate (taped to the sleeve); and one outer un-taped, to allow for "onion-peeling."



Hazard Controls (cont.)

Other considerations:

- Unobstructed, accessible eyewash and/or shower
- Strategically-staged fire extinguishers (of appropriate type) for trained technicians
- First aid supplies
- Designated medical facility
- A well-rehearsed emergency response plan



• Examples of PPE include:



Regulatory Infrastructure

- EPA Exceptions
- DOT Exceptions
- TSDF Acceptance criteria (as this

relates to permit restrictions)



§ 66268.42. Treatment Standards Expressed As Specified Technologies

- (1) the lab packs comply with the applicable provisions of section 66264.316 and section 66265.316;
- (2) the lab pack does not contain any of the wastes listed in Appendix IV to chapter 18;



§ 66268.42. Treatment Standards Expressed As Specified Technologies (cont.)

- (3) the lab packs are incinerated in accordance with the requirements of article 15, chapter 14 or article 15, chapter 15 and;
- (4) any incinerator residues from lab packs containing Doo4, Doo5, Doo6, Doo7, Doo8, Do10, and Do11 are treated in compliance with the applicable treatment standards specified for such wastes in article 4, chapter 18.



MUST BE STABILIZED

- Doo4 = arsenic
- Doo5 = barium
- Doo6 = cadmium
- Doo7 = chromium (VI)

- Doo8 = lead
- Do10 = selenium
- Do11 = silver



Appendix IV. to Chapter 18

Wastes Excluded From Lab Packs Under the Alternative Treatment Standards of Section 66268.42(c)

Hazardous waste with the following EPA Hazardous Waste Codes may not be placed in lab packs <u>under alternative lab pack treatment standards</u> of section 66268.42(c), Doog, Fo19, Koo3, Koo4, Koo5, Koo6, Ko62, Ko71, K100, K106, Po10, Po11, Po12, Po76, Po78, U134, U151.



- Doog = mercury
- Fo19 = wastewater treatment sludges from the chemical conversion coating of aluminum
- Koo3 = wastewater treatment sludge from the production of molybdate orange pigments
- Koo4 = wastewater treatment sludge from the production of zinc yellow pigments



- Koo5 = wastewater treatment sludge from the production of chrome green pigments
- Koo6 = wastewater treatment sludge from the production of chrome oxide pigments (anhydrous and hydrated)
- Ko62 = Spent pickle liquor generated by steel finishing operations at facilities within the iron and steel industry



- Ko71 = Brine purification muds from the mercury cell process in chlorine production, where separately pre-purified brine is not used
- K100 = Waste leaching solution from acid leaching of emission control dust/sludge from secondary lead smelting
- K106 = Wastewater treatment sludge from the mercury cell process in chlorine production



- Po1o = arsenic acid
- Po11 = arsenic oxide
 (a.k.a. arsenic pentoxide)
- Po12 = arsenic trioxide
- Po₇6 = nitric oxide

- Po₇8 = nitrogen dioxide
- U134 = hydrofluoric
 acid (and hydrogen fluoride)
- U151 = mercury



49 CFR 173 12

Lab packs.

(b)...Waste materials classed as Class or Division 3, 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 8, or 9 are excepted from the specification packaging requirements ...for combination packagings if packaged in accordance with this paragraph (b) and transported for disposal or recovery by highway, rail or cargo vessel.



49 CFR 173 12

Hazard Classes that are eligible for the lab packing exception

- Class 3 = flammable liquids
- Div 4.1 = flammable solids
- Div 4.2 = spontaneously combustible materials,
- Div 4.3 = water reactive materials





- Div 5.1 = oxidizing agents
- Div 5.2 = organic peroxides
- Div 6.1 = toxic (or poisonous) materials
- Class 8 = corrosives
- Class 9 = miscellaneous



DOT Exceptions 49 CFR 173 12

Lab packs.

In addition, a generic description from the § 172.101 Hazardous Materials Table may be used in place of specific chemical names, when two or more chemically compatible waste materials in the same hazard class are packaged in the same outside packaging.



49 CFR 173 12

Lab packs.

The requirements for the inclusion of technical names for n.o.s. descriptions on shipping papers and package markings do not apply ... except that packages containing materials meeting the definition of a hazardous substance* must be described and marked as required

*NOTE: The reference to hazardous substances pertains to "reportable quantities" (RQ)



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DOT Exceptions 49 CFR 173 12

Combination packaging requirements:

The inner packagings must be either...

- glass, not exceeding 4 L (1 gallon) rated capacity, or
- metal or plastic, not exceeding 20 L (5.3 gallons) rated capacity.

NOTE: a combination packaging is a non-bulk configuration that consists of an outer packaging and inner items.



49 CFR 173 12

 Inner packagings containing liquid must be surrounded by a chemically compatible absorbent material in sufficient quantity to absorb <u>the total</u> <u>liquid contents.</u>



Outer packaging.

EACH OUTER PACKAGING MAY ONLY CONTAIN ONE CLASS OF WASTE MATERIAL.



Outer packaging.

The following outer packagings are authorized...

(except that Division 4.2 Packing Group I materials must be packaged using UN standard steel or plastic drums tested and marked to the Packing Group I performance level for liquids or solids; and bromine pentafluoride and bromine trifluoride may not be packaged using UN 4G fiberboard boxes):



Outer packaging.

- A UN 1A2, UN 1B2 or UN 1N2 metal drum,
- a UN 1D plywood drum,
- a UN 1G fiber drum, or
- a UN 1H2 plastic drum, tested and marked to at least the Packing Group III performance level for liquids or solids;



Outer packaging.

At a minimum, a double-walled UN 4G fiberboard box made out of 500-pound burst-strength fiberboard <u>fitted</u>
 with a polyethylene liner at least 3 mils (o.oo3 inches)
 thick (and when filled during testing to 95 percent capacity with a solid material), successfully passes the tests ...to at least the Packing Group II performance level for liquids or solids



liner

Outer packaging.

 A UN 11G fiberboard intermediate bulk container (IBC) or a UN 11HH2 composite IBC, fitted with a polyethylene liner at least 6 mils (0.006 inches) thick, that successfully passes the tests ...to at least the Packing Group II performance level for liquids or solids;



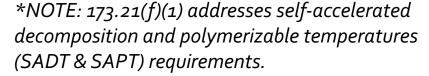
Outer packaging.

THE GROSS WEIGHT OF EACH COMPLETED COMBINATION PACKAGE MAY NOT EXCEED 205 KG (452 LBS).



PROHIBITED MATERIALS.

- Materials that are poisonous-by-inhalation
- A temperature controlled material (unless it complies with § 173.21(f)(1))*
- A Division 6.1, Packing Group I material,
- Chloric acid, and
- Oleum (fuming sulfuric acid).





24th California Unified Program Annual Training Conference March 22, 23, 24, 29, 30, 31, 2022

TSDF Acceptance Criteria

- A treatment, storage, and disposal facility (TSDF) may have requirements that are more stringent than what is specified in regulation.
- This may be due to permit constraints or TSDF operational preference.



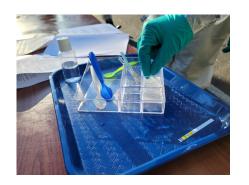
TSDF Acceptance Criteria

 Notwithstanding, to ensure that waste is accepted by the designated facility, compliance is required.





A field chemist identifies the hazardous properties and assigns the material to an appropriate DOT hazard class.



Bear in mind, not all waste materials will meet a DOT hazard class definition.



An aqueous solution with a "pH of 2" makes a material a RCRA corrosive liquid, but does not necessarily translate to the material meeting the definition of a "DOT Class 8...."

Neither does seeing the word "nitrate" always means that the waste is oxidizing.





A field chemist must also be able to review constituents and make determinations based on concentrations, functional groups, and field-test confirmations.





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March 22, 23, 24, 29, 30, 31 - 2022

A field chemist, by using available normality and molarity should be able to calculate the concentration of a given substance in a waste matrix.





For example, a 1L bottle of 3M nitric acid is added to a bottle of deionized water, making ~ 4L of solution.





The nitric acid formula is HNO_3 . It's molecular weight is 63.01g/mol.

A 1M solution of nitric acid = 6.301%

Therefore, a 3M solution equates to 18.903%.





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18.903% of 1000mL (1L) = 189.03 mL

189.03 mL of nitric acid dissolved in enough water to fill a 4L bottle amounts to 4.72575% or 4.73% HNO₃

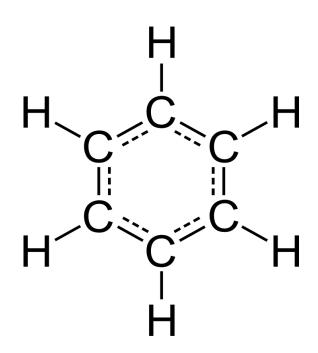




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March 22, 23, 24, 29, 30, 31 - 2022

A field chemist should know that all substances that do not contain carbon are "inorganic"... and that organic chemistry is the study of carbon-containing substances that exhibit carbon's unique binding properties.





Organic & Inorganic Chemistry (Definitions)

 Chemicals that do not contain carbon are ALWAYS inorganic.

 Chemicals that contain carbon (with few exception) are organic.

Examples of inorganic carbon-containing substances include oxides of carbon (e.g., carbon monoxide & carbon dioxide); metallic cyanides (e.g., sodium, potassium, silver, & gold cyanides); sodium carbonate, & carbon disulfide.

Organic & Inorganic Chemistry (Definitions)

The symbol for carbon is C... as in CH_4 or C_6H_6

The following symbols do NOT represent carbon:

- Ca = CalciumCo = Cobalt
- Cd = Cadmium
 Cr = Chromium
- Ce = CesiumCs = Cesium
- Cf = Californium Cu = Copper
- Cl = Chlorine

Chemical Hazards Exercise



Two of the following chemicals are inorganic

- Methyl ethyl ketone
 CH₃COCH₂CH₃
- Benzene C₆H₆
- Calcium hypochlorite CaOCl
- Acetone (CH₃)₂CO
- Oil of Vitriol H₂SO₄
- Sodium acetate NaCH₃CO₂

Occasionally it may become necessary to perform an "acute toxicity estimate" (ATE) to determine whether a waste meets DOT's (or the State's) definition of toxicity

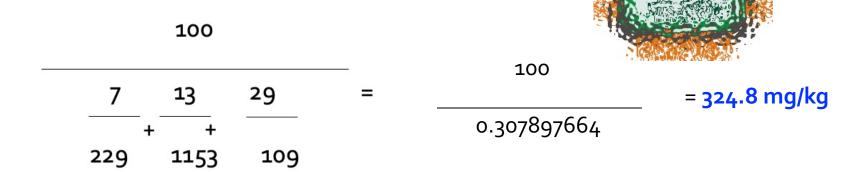


Where %A $_{\rm X}$ is the weight percent of each component in the waste mixture and [FNT]A $_{\rm X}$ is the acute oral or dermal LD $_{\rm 50}$ or the acute oral LD $_{\rm LO}$ of each component.



A mixture contains 7% of Chemical "A," which has an oral LD50 of 229 mg/kg; 13% of Chemical "B," which has an LD50 of 1153 mg/kg; and 29% of Chemical "C," which has an LD50 of 109 mg/kg





CONCLUSION: The waste is **California** toxic (with an oral toxicity LD_{50} threshold of <2500 mg/kg but not **DOT** toxic, the latter having an oral LD_{50} threshold of \leq 300 mg/kg



In addition to required PPE and containers of appropriate types and sizes, the following items will be needed:

- Drum liners
- Drum closure tools (and instructions)
- A variety of polyethylene bag sizes (for bagging smaller chemicals)
- HDPE "Mayonnaise" jars (for "multi-packing" small compatible vials)



- Parafilm wrap
- Blank labels (hazardous waste and small plain white adhesive labels)
- Chemical reference material
- Vermiculite, diatomaceous earth, and polypropylene pulp
- Scoops, pipettes
- Absorbent pads, dust pan and fox tail broom (The tools used to lab pack can also be used to clean a small spill)



- Secondary containment trays
- "Bermed" carts
- Drum dollies
- pH paper, LEL meter, DI water, squirt bottles, potassium iodide paper and HCl for oxidizer tests....
- Placards
- Hazard Class labels
- Orientation arrows
- Duct tape





- List of emergency and non-emergency contacts
- Mean(s) of internal and external communication....



- For unused chemicals, first check section 14 of the manufacturer's SDS for hazard classification guidance.
- If you agree with the classification, manage the waste accordingly; if you do not, call the manufacturer.
- The 49 CFR 172.101 HAZMAT Table is also a good reference for cclassifying unused chemicals.



 When lab packing, 70% of the chemicals typically take 30% of the time to properly characterize and classify.



• (It is the remaining 30% of the chemicals will takes most of the time.)





- Either focus on the "lower lying" fruit at the onset, to achieve measured progress and the problematic items last, or
- Assign someone to work on the difficult items, while the rest of the team addresses the 70%.







- Generate and maintain an inventory of the content of each container.
- Whenever possible, get an inventory of the chemicals to-be-packed in advance from your client.
- Enter the chemicals onto an excel spreadsheet
- Classify... then sort....



Chemical Name	CAS	Manufacturer	Amount	Unit of Measure	Primary Hazard	Subsidiary Hazard	Tertiary Hazard	Comments
(-)-Riboflavin	83-88-5	Sigma-Aldrich	25	G				organic material; keep separate from oxidizing agents
					4900000			incompatible with oxidizers,
1-(2-Hydroxyethyl)piperazine	103-76-4	Sigma-Aldrich	100	G	skin and eye			acids, copper, and chlorinated
, , , , , , , , , , , , , , , , , , , ,	25.345 27	•	2330	88	irritant			solvents
								possible Marpol marine
1-Decanol	112-30-1	Alfa Aesar	2500	mL	combustible	skin and eye irritant		pollutant; incompatible with
								oxidizers
1-Decanol	112-30-1	Alfa Aesar	2500	mL	combustible	skin and eye irritant		possible Marpol marine pollutant; incompatible with
1-Decanol	112-30-1	Alia Aesar	2500	ML	Combustible	skin and eye imtant		oxidizers
								possible Marpol marine
1-Decanol	112-30-1	TCI America	500	mL	combustible	skin and eye irritant		pollutant; incompatible with
5.5.2	15/5/	73 13 878	535307					oxidizers
1-Ethylpiperazine	5308-25-8	Sigma-Aldrich	50	ML	flammable	skin and eye irritant		incompatible with oxidizing
1-Ethylpiperazine	3306-23-6	Signa-Alunch	30	IVIL	Hammable	Skill allu eye illilalil		agents
1-Methyl-2-Pyrrolidinone	872-50-4	Sigma-Aldrich	100	ML	combustible	possible teratogen	skin and eye irritant	incompatible with oxidizing and
- memy z r ymemamene	0.200.	0.9.1.0.7.10.1.01.			0011124011210	possible terategen	onin and eye initian	reducing agents and acids
1-Methylpiperazine	109-01-3	Sigma-Aldrich	100	G	corrosive	flammable	toxic	incompatible with oxidizers and acids
	800-50000000000 NO	1000	0.200.150.150	76/1/20		Desc. Bosses	No. 199	incompatible with oxidizers and
1-Methylpiperazine	109-01-3	Sigma-Aldrich	100	G	corrosive	flammable	toxic	acids
4 North dans and and	00.07.0	Oleman Aldelah	400	G	causes serious	- I - I - I A		incompatible with oxidizers and
1-Naphthaleneacetic acid	86-87-3	Sigma-Aldrich	100	G	eye damage	skin irritant		bases
1-Pentanol	71-41-0	Alfa Aesar	500	ML	flammable	skin irritant		incompatible with oxidizing
T official of	71 11 0	7 111 0 7 100 01	000	IVIL	Пантиналю	OKIII IIIICAIIC		agents
1,1,1,3,3,3, Hexafluoro-2 propanol	920-66-1	Acros Organics	50	ML	corrosive	toxic		acids, bases, finely divided
								powders, and oxidizing agents incompatible with oxidizing
1,10-Phenanthroline	66-71-7	Sigma-Aldrich	2.5	G	toxic			agents
	(12222) E22322	20 2000000		12	100103 10			incompatible with oxidizing
1,2,3,4-Butanetetracarboxylic Acid	1703-58-8	Sigma-Aldrich	100	G	eye irritant			agents
1,3,5-Benzenetricarbonyl trichloride	4422-95-1	Sigma-Aldrich	25	G	corrosive	reacts with water		incompatible with oxidizing
1,3,5-Berizerietricarboriyi trichloride	4422-95-1	Sigma-Alunch	25	G	corrosive	reacts with water		agents and bases
1,4-Butanediol Diglycidyl Ether	2425-79-8	Sigma-Aldrich	50	G	skin irritant			incompatible with acids, bases,
- , · Dataneale: Digiyetay: Line:	2.20.00	0.9.1.0.7.10.1.01.						oxidizers, and halides
1,4-Dimethylpiperazine	106-58-1	Sigma-Aldrich	100	G	flammable	corrosive		incompatible with acids and
								oxidizing agents incompatible with oxidizing
1,4-Dioxane	123-91-1	Sigma-Aldrich	1	L	flammable	peroxide former		agents, reducing agents,
1,4 Blokario	120 01 1	Oigina / tanon	· ·	_	пантивые	poroxido romioi		halides, and trimethyl aluminum
4.40 Dhananthadina	00.74.7	Ciarra Aldri I	0.5	_				incompatible with oxidizing
1,10-Phenanthroline	66-71-7	Sigma-Aldrich	2.5	G	toxic			agents
2-Butanol	78-92-2	Rigaku	250	ML	flammable			+34
2-Butanone (MEK)	78-93-3	Sigma-Aldrich	500	ML	flammable			

Chemical Name	CAS	Manufacturer	Amount	Unit of Measure	Primary Hazard	Subsidiary Hazard	Tertiary Hazard	Comments
1-Naphthaleneacetic acid	86-87-3	Sigma-Aldrich	100	G	causes serious eye damage	skin irritant		incompatible with oxidizers and bases
1-Methyl-2-Pyrrolidinone	872-50-4	Sigma-Aldrich	100	ML	combustible	possible teratogen	skin and eye irritant	incompatible with oxidizing and reducing agents and acids
1-Decanol	112-30-1	Alfa Aesar	2500	mL	combustible	skin and eye irritant		possible Marpol marine pollutant; incompatible with oxidizers
1-Decanol	112-30-1	Alfa Aesar	2500	mL	combustible	skin and eye irritant		possible Marpol marine pollutant; incompatible with oxidizers
1-Decanol	112-30-1	TCI America	500	mL	combustible	skin and eye irritant		possible Marpol marine pollutant; incompatible with oxidizers
1-Methylpiperazine	109-01-3	Sigma-Aldrich	100	G	corrosive	flammable	toxic	incompatible with oxidizers and acids
1-Methylpiperazine	109-01-3	Sigma-Aldrich	100	G	corrosive	flammable	toxic	incompatible with oxidizers and acids
1,3,5-Benzenetricarbonyl trichloride	4422-95-1	Sigma-Aldrich	25	G	corrosive	reacts with water		incompatible with oxidizing agents and bases
1,1,1,3,3,3, Hexafluoro-2 propanol	920-66-1	Acros Organics	50	ML	corrosive	toxic		acids, bases, finely divided powders, and oxidizing agents
1,2,3,4-Butanetetracarboxylic Acid	1703-58-8	Sigma-Aldrich	100	G	eye irritant			incompatible with oxidizing agents
1,4-Dimethylpiperazine	106-58-1	Sigma-Aldrich	100	G	flammable	corrosive		incompatible with acids and oxidizing agents
1,4-Dioxane	123-91-1	Sigma-Aldrich	1	L	flammable	peroxide former		incompatible with oxidizing agents, reducing agents, halides, and trimethyl aluminum
1-Ethylpiperazine	5308-25-8	Sigma-Aldrich	50	ML	flammable	skin and eye irritant		incompatible with oxidizing agents
1-Pentanol	71-41-0	Alfa Aesar	500	ML	flammable	skin irritant		incompatible with oxidizing agents
2-Butanol	78-92-2	Rigaku	250	ML	flammable			
2-Butanone (MEK)	78-93-3	Sigma-Aldrich	500	ML	flammable			
1-(2-Hydroxyethyl)piperazine	103-76-4	Sigma-Aldrich	100	G	skin and eye irritant			incompatible with oxidizers, acids, copper, and chlorinated solvents
1,4-Butanediol Diglycidyl Ether	2425-79-8	Sigma-Aldrich	50	G	skin irritant			incompatible with acids, bases, oxidizers, and halides

- Survey new work areas for peripheral hazards.
- Establish an organized work zone.
- "Gross" segregation can be achieved by doing by doing the following:



- Separate liquids from solids.
- Separate obvious incompatibles within these groups (e.g., acids from bases).
- Separate organics from inorganics.
- Create groups based upon chemical families.
- Fine tune the segregation.



- Be careful when packing non-RCRA waste streams:
 a liquid with a pH of 2.3 and a liquid with a pH of
 12.0 are both non-RCRA, but they should not be
 packed together.
- They can be packed in an appropriate "acid" or "base" drum, provided that the drums do not contain highly concentrated acids and bases.



- Have containers for debris wastestream (e.g., one for RCRA and another for non-RCRA debris).
- Ensure that empty containers that previously held acute and/or and extremely hazardous waste are managed properly.



- Do not use "special permits" (SP) that were not issued to your company unless the permit language allows it, and the permit is still in effect.
- Some SPs get adopted into law (e.g., the one that was used to pack aerosols into cubic-yard boxes)



- Please be advised that SP14712, allowing enamel paint tobe-packed into cubic yard boxes, which was owned by Clean Earth, Inc., has expired. (Unless renewed, this SP is no longer valid and should not be used.)
- Some chemicals may be "controlled substances," for which additional controls will be imposed by the Drug Enforcement Agency.

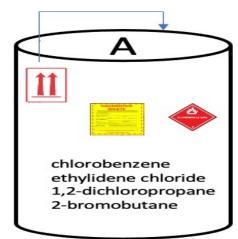




10-MINUTE BREAKTIME!

(Lab Pack Tabletops Following Break)







Chemical:

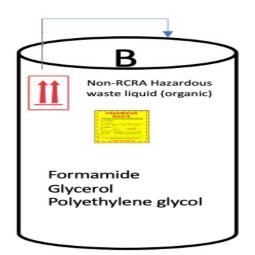
N' N'-Dimethylformamide Physical form: liquid Chemical formula:

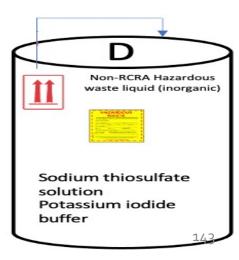
C₃H₇NO

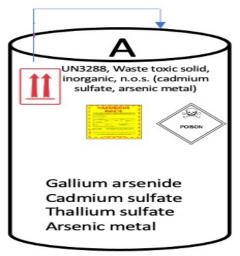
Flashpoint: 135°F Boiling point: 307°F

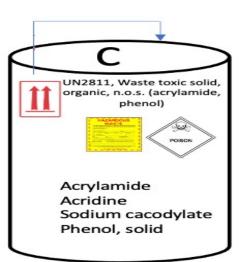
Oral LD₅₀: 3010 mg/kg Instability: Reacts with oxidizing agents and halogens.

INTO WHICH DRUM SHOULD THIS CHEMICAL BE PACKED?









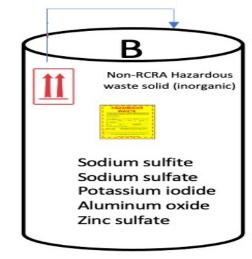
Chemical:

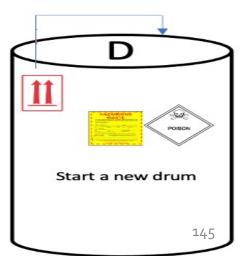
Arsenic pentoxide
Physical form: solid
EPA Code: P011

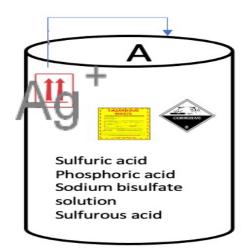
Chemical formula: As₂O₅

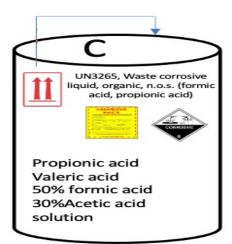
Oral LD₅₀: 8 mg/kg Instability: Reacts with oxidizing agents and acid.

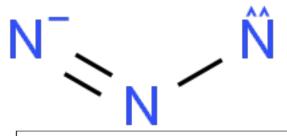
INTO WHICH DRUM SHOULD THIS CHEMICAL BE PACKED?











Chemical:

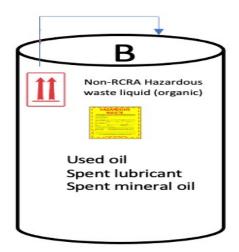
Oil of Vitriol

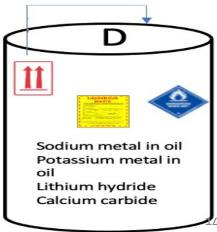
Physical form: liquid Chemical formula:

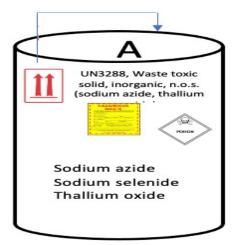
 H_2SO_4

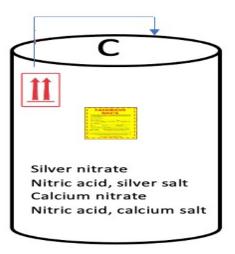
Oral LD₅₀: 2140 mg/kg Instability: Reacts with bases, organics, and water.

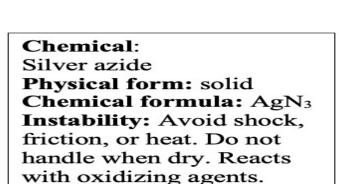
INTO WHICH DRUM SHOULD THIS CHEMICAL BE PACKED?



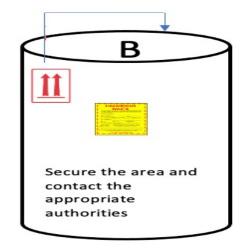


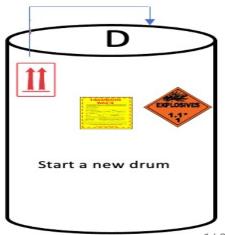




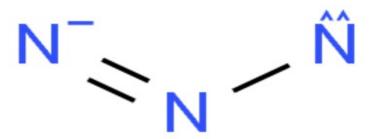












Silver azide (CAS No. 13863-88-2) SDS

CAS No: 13863-88-2

Molecular Weight: 149.8883

Molecular Formula: AgN₃

Names and IdentifiersPropertiesSafety and HandlingComputational chemical data



SAFETY DATA SHEETS

According to Globally Harmonized System of Classification and Labelling of Chemicals (GHS) - Sixth revised edition

Version: 1.0

Creation Date: Aug 19, 2017

Revision Date: Aug 19, 2017

1.Identification 1.1GHS Product identifier Product name Silver(1+) azide 1.2Other means of identification Product number Other names acrylic acid silver (I)-compound 1.3Recommended use of the chemical and restrictions on use Identified uses For industry use only. no data available Uses advised against 1.4Supplier's details Company Address Telephone Fax 1.5Emergency phone number Emergency phone number Service hours Monday to Friday, 9am-5pm (Standard time zone: UTC/GMT +8 hours). 2. Hazard identification 2.1 Classification of the substance or mixture Explosives, Unstable explosive

Pictogram(s) Signal word Danger

Hazard statement(s) H200 Unstable explosive

2.3Other hazards which do not result in classification

Precautionary statement(s) Prevention

P201 Obtain special instructions before use. P250 Do not subject to grinding/shock/friction/....

P280 Wear protective gloves/protective clothing/eye protection/face protection.

P370+P372+P380+P373 In case of fire: Explosion risk. Evacuate area. DO

NOT fight fire when fire reaches explosives.

Storage P401 Store in accordance with...

Disposal P501 Dispose of contents/container to ...

3. Composition/information on ingredients

none

Response

3.1Substances								
Chemical name	Common names and synonyms	CAS number	EC number	Concentration				
Silver(1+) azide	Silver(1+) azide	13863-88-2	none	100% 53				

6.Accidental release measures

6.1Personal precautions, protective equipment and emergency procedures

Use personal protective equipment. Avoid dust formation. Avoid breathing vapours, mist or gas. Ensure adequate ventilation. Evacuate personnel to safe areas. Avoid breathing dust. For personal protection see section 8.

6.2Environmental precautions

Prevent further leakage or spillage if safe to do so. Do not let product enter drains. Discharge into the environment must be avoided.

6.3Methods and materials for containment and cleaning up

Pick up and arrange disposal. Sweep up and shovel. Keep in suitable, closed containers for disposal.

7. Handling and storage

7.1Precautions for safe handling

Avoid contact with skin and eyes. Avoid formation of dust and aerosols. Avoid exposure - obtain special instructions before use Provide appropriate exhaust ventilation at places where dust is formed. For precautions see section 2.2.

7.2Conditions for safe storage, including any incompatibilities

Store in cool place. Keep container tightly closed in a dry and well-ventilated place.

accordance with applicable laws and good laboratory practices. Wash and dry hands. The selected protective gloves have to satisfy the specifications of EU Directive 89/686/EEC and the standard EN 374 derived from it.

Respiratory protection

Wear dust mask when handling large quantities.

Thermal hazards

no data available

1/2	
9.Physical and chemical properti	es
Physical state	no data available
Colour	no data available
Odour	no data available
Melting point/ freezing point	251oC
Boiling point or initial boiling	no data available
point and boiling range	
Flammability	no data available
Lower and upper explosion	no data available
limit / flammability limit	
Flash point	no data available
Auto-ignition temperature	no data available
Decomposition temperature	no data available
pН	no data available
Kinematic viscosity	no data available
Solubility	no data available
Partition coefficient n-	no data available
octanol/water (log value)	
Vapour pressure	no data available
Density and/or relative density	no data available
Relative yapour density	no data available
Particle characteristics	no data available

10.Stability and reactivity

10.1Reactivity

no data available

10.2Chemical stability

Stable under recommended storage conditions.

10.3Possibility of hazardous reactions

no data available

10.4Conditions to avoid

no data available

10.5Incompatible materials

no data available

10.6Hazardous decomposition products

no data available

11. Toxicological information

14.Transport information							
14.1UN Number ADR/RID: no data available	IMDG: no data available	IATA: no data available					
14.2UN Proper Shipping Name ADR/RID: no data available IMDG: no data available IATA: no data available							
14.3Transport hazard class(es) ADR/RID: no data available	IMDG: no data available	IATA: no data available					
14.4Packing group, if applicable ADR/RID: no data available	IMDG: no data available	IATA: no data available					
14.5Environmental hazards ADR/RID: no	IMDG: no	IATA: no					
14.6Special precautions for user no data available							
14.7Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code no data available							

Symbols	Excerpt from DOT A Hazmat T Hazardous materials descriptions	72.101		Label	Special	(8)		
	and proper shipping names	class or Division	Numbers	PG	Label Codes	provisions (§ 172.102)	Packaging (§ 173.***)	
							Exceptions	Non- bulk
						TP33		
	Silver azide (dry)	Forbidden						
	Silver chlorite (dry)	Forbidden						
	Silver cyanide	6.1	UN1684	II	6.1	IB8, IP2, IP4, T3, TP33	153	212 58

Effective date: 10.24.2014 Page 1 of 8

Glyoxal, 40%

SECTION 1: Identification of the substance/mixture and of the supplier

Product name: Glyoxal, 40%

Manufacturer/Supplier Trade name:

Manufacturer/Supplier Article number:

Recommended uses of the product and restrictions on use:

Manufacturer Details:

SECTION 11: Toxicological information Acute Toxicity: 107-22-2 Oral:

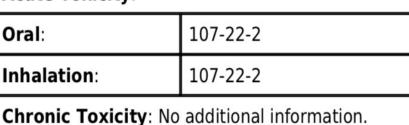
Inhalation:

Sensitization:

Carcinogenicity:

Reproductive Toxicity:

Mutagenicity:



Single Target Organ (STOT): Numerical Measures:

Corrosion Irritation: No additional information.

- No additional information.
- No additional information. No additional information.

No additional information.

- No additional information. No additional information.
- LC50 rat: 2410mg/m3/4hr

- LD50-rat: 200mg/kg

160

SECTION 14: Transport information

UN-Number:

Not Regulated.

UN proper shipping name:

Not Regulated.

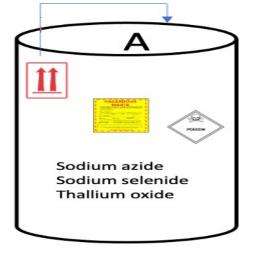
Transport hazard class(es): None

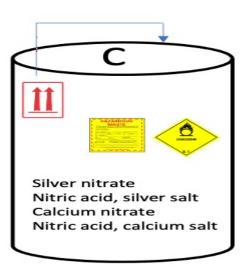
Packing group: Not Regulated

Environmental hazard: None

Transport in bulk: Not Applicable

Special precautions for user: None





Chemical:

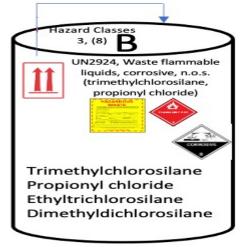
Diethyldichlorosilane Physical form: liquid

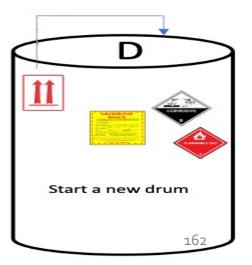
Chemical formula: C₂H₆Cl₂Si

Hazard Classes 8, (3)
Instability: Reacts with

bases, oxidizers, and water.

INTO WHICH DRUM SHOULD THIS CHEMICAL BE PACKED?





Peripheral Operations

Lab pack operations are typically supported by other activities such as...

- Bulking
- Hazard Categorization Tests (HAZCAT)
- Packing hazard classes and divisions, which are not eligible for lab packing exceptions, pursuant to other exceptions or to applicable regulations (e.g. aerosols and "poison inhalation hazards" (PIH).



Peripheral Operations

Lab pack operations are typically supported by other activities (cont.)

• Shipment prep activities (e.g., oil immersions, water immersions, adding inhibitors to ethers... all of which require the acquisition of an emergency treatment permit from DTSC. Allow at least 5-to-10 business days for approval.)

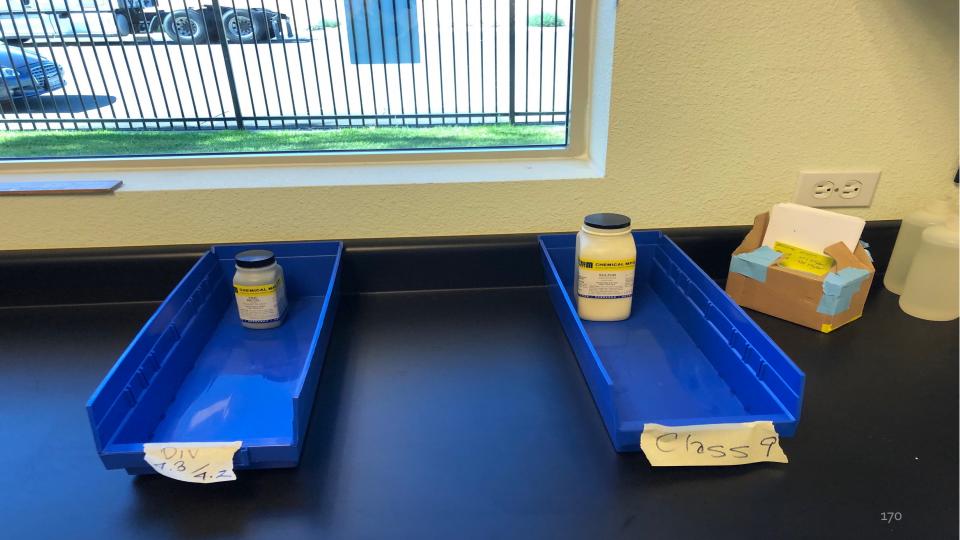






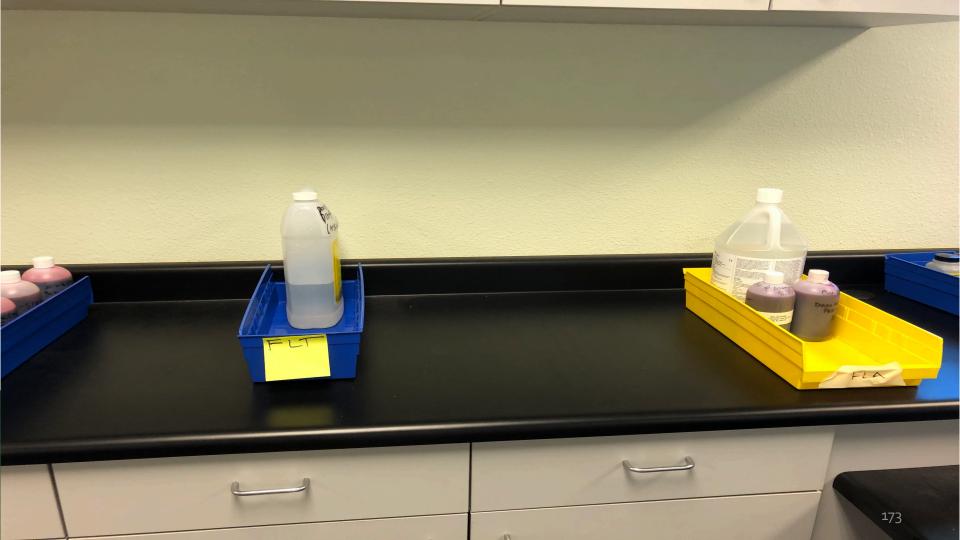






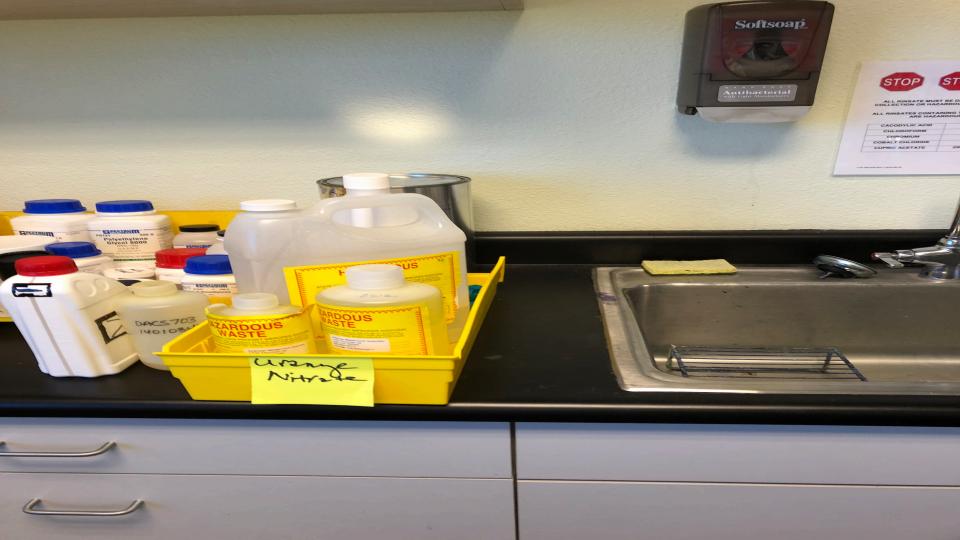












Earl,

estimate

\$9,984.00

Pick-up, packaging, and disposal quote for the low level radioactive waste described below:

```
Solid Uranium Nitrate- estimated 500 grams, plus ziplock 14 grams @
$12.00/gram
                         $6,168.00
3 liters 99% aqueous, 1% U Nitrate solution-as mixed waste to NSSI, Houston,
                $3,000.00 or
Texas
3 liters 99% aqueous, 1% U nitrate solution-as rad only, generator certified
              $1,000.00
haz
Packaging-2 drums @ $100.00
                                                                  200.00
each
Sales tax
                                                                                    $
                                                                                         16.50
8.25%
SW Compact export permit-only required if U nitrate/aqueous solution is non
haz
                     500.00
Pick up
                                                                                     Ś
fee
                                                                                         600.00
Total
```

177

\$8,484.50 or



SUMMARY

- Introduction
- Safety
- Regulatory Infrastructure
- Field Chemistry
- Supplies

- Lab Packing Recommendations
- Exercises
- Peripheral Operations
- Project Review



In closing....

LAB PACKING IS FUN!!!!



24th California Unified Program Annual Training Conference

March 22, 23, 24, 29, 30, 31 - 2022



Any Questions?

Final Slide - Include your name, agency, email, phone

