**What Are Lab Packs and How Could Your Facility Use Them?**

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I’ve never been a fan of “spring” cleaning, but it is a necessary part of good housekeeping around the home, or at your facility. When was the last time your facility did a “spring cleaning” walkthrough to see if there are any materials around your workplace that are expired, or you don’t need? Flammable cabinets, chemical storage, research/QC labs and maintenance shops are likely places these items accumulate.

**What is a Lab Pack?**

Since most of the items in these locations are likely to be in smaller containers, they aren’t treated like regular waste streams. Lab packs are a practical solution. Lab packs are consolidation packaging of “like” materials from the smaller containers into larger containers to satisfy proper DOT shipping and EPA RCRA hazardous waste management.

The lab pack was designed for managing expired materials in labs, however, it’s something that can be used for any facility that needs to do a cleanout of smaller containers usually less than 10 gallons each.

**What Items Are Candidates for a Lab Pack?**

Look for jars, jugs, vials and cans of hazardous materials, including chemicals, solvents, paints, thinners, acids, cleaners, strippers, inks and more. These are typically out of date, off-specification, partially used, and no longer needed.

**Who Does Lab Packing?**

There are strict regulations on who is authorized and qualified to do lab packing. This is because of the need to determine which containers can be put together and which ones may cause harmful reactions with each other. Typically, hazardous waste carriers provide this service.

**How is Lab Packing Accomplished?**

First, items are segregated, that is, sorted, for combining into one larger container. Items are segregated by:

* Hazard class – most common are flammables, corrosives, and toxics
* Type of material – liquids, solids, etc.
* Compatibility

“Paperpack” is the term used to show the segregation by container. An initial inventory list is converted into lab pack inventory sheets (what goes into each container). This is what waste companies use to create approval numbers for compliance under RCRA. It is also how they establish price. Pricing is based on disposal, transportation and labor associated with packaging.

Packaging is accomplished by:

* Putting the segregated materials into their respective larger containers;
* Filling with a packing material (vermiculite is most common) to create stability and containment while shipping;
* Vermiculite will be in the base and surrounding each of the internal containers; and,
* The smaller containers are placed into the larger container vertically, so the label with the double arrows pointing up is on the outer packaging.

**RCRA Regulation Implications**

A lab pack counts towards your waste generation status if you’re a Very Small Quantity Generator (VSQG), or a Small Quantity Generator (SQG), so be mindful of the amount of hazardous waste generated in the process.

For states that have already adopted the Generator Improvements Rule, this is a good use of the episodic event, and would not count against your generator status.