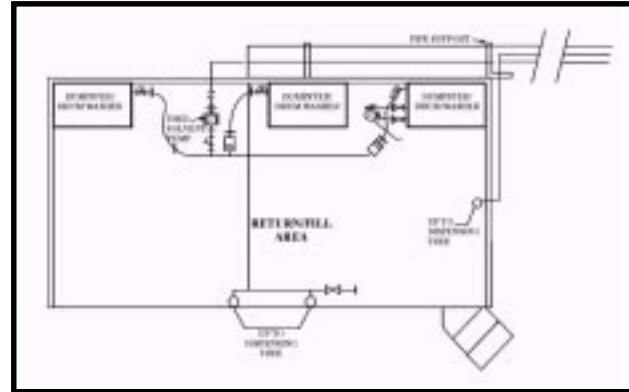


2.2.4 Drum Washer

Commercial drum washing systems are available from several manufacturers. These units are regulated as Subpart X units if the units are handling non-RCRA empty drums. The definition of RCRA-empty container is provided in 40 CFR §261.7. Drum washers may be fully automated with several stations to flush, rinse, purge, and siphon both poly and steel drums. In general, a drum washing system provides enclosed containment to capture the liquid solvent used to clean the interior and exterior of a drum. The solvent may be applied by a high-pressure spray wand or automated rotating brushes. The cleaning solvent may be as simple as high-pressure water, although it is common to use a commercial chemical solvent. Recovered solvent carries drum bottoms and may be recycled through a closed-loop solvent recovery system associated with the drum washer. The drum washer may also include an exhaust fan and air pollution control equipment (e.g., fume scrubber) to capture volatile organics and particulates evolved during drum



Schematic of Drum Washer.

cleaning. In addition to drum washers, systems are also available to clean smaller containers such as totes and pails. Examples of drum washing units are shown in the column to the right.

2.2.5 Mercury Bulb Crushers

Fluorescent lamps are widely used in businesses, as they provide an energy-efficient source of lighting. The commercial and industrial sectors dominate usage of fluorescent lamps, accounting for over 90 percent of total usage. Fluorescent lights are designed so that approximately half of them will operate after 20,000 hours of operation. Where these lamps are being used on a small scale, they are generally replaced as they burn out, one at a time.



View of interior Drum Washer.