

Material Storage Potential Pollution Case Study

An outside 55 gallon drums storage area contains:

- 1 solvent drum on a pallet (red drum)
- 3 used oil filters drums against the wall under sign – “used oil filters” (by drum dollies)
- 4 petroleum material drums of on a pallet in shrink wrap
- 4 hazardous waste drums
- 1 spill kit
- 2 drums with used paint up against a wall
- 3 empty drums for hazardous waste against wall
- 10 empty drums (not all seen in photo) for used oil filters up against a wall

The containment area has walls on three sides



The fourth side has a 6 inch berm running the length of the containment area with a 4 foot break at one end adjacent to a ramp for forklift access.



The containment area slants away from the side with the forklift ramp. The spill kit located in the containment area has absorbent material, pads, socks, and instructions.



Drums with hazardous waste labels are downslope beyond the spill kit. The section in front of forklift ramp is designated for empty drums.



Stains present in containment area including around empty filter barrels with rusted lid rings



Questions

- What other information would you gather to assess the situation?
- Does this outside material storage have adequate BMPs?
- If there are the potential pollutant discharges, what are they and what are the corrective actions needed?
- What Best Management Practices, if any, would you discuss with the business manager?
- What enforcement tool, if any, would you use?

Best Management Practices

- Cover drum storage area or Provide enclosures with labels to store drums
- Place drums on spill pallets
- Move drums back from the edge of the containment
- Ensure drums are labeled properly
- Correspond drums with area signs

