Outdoor Container Storage

Description
Accidental releases of materials from above ground liquid storage tanks, drums, and dumpsters present the potential for contaminating stormwaters with many different pollutants. Tanks may store many potential stormwater runoff pollutants, such as gasoline, aviation gas, diesel fuel, ammonia, solvents, syrups, etc. Materials spilled, leaked, or lost from storage tanks may accumulate in soils or on other surfaces and be carried away by rainfall runoff. These source controls apply to containers located outside of a building used to temporarily store liquid materials and include installing safeguards against accidental releases, installing secondary containment, conducting regular inspections, and training employees in standard operating procedures and spill cleanup techniques.

Approach
Pollution Prevention
- Educate employees about pollution prevention measures and goals
- Keep an accurate, up-to-date inventory of the materials delivered and stored on-site. Re-evaluate inventory needs and consider purchasing alternative products. Properly dispose of outdated products.
- Try to keep chemicals in their original containers, and keep them well labeled.

Objectives
- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents
- Sediment
- Nutrients
- Trash
- Metals
- Bacteria
- Oil and Grease
- Organics
- Oxygen Demanding

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Suggested Protocols

General

- Develop an operations plan that describes procedures for loading and/or unloading. Refer to SC-30 Outdoor Loading/Unloading for more detailed BMP information pertaining to loading and unloading of liquids.

- Protect materials from rainfall, runon, runoff, and wind dispersal:
  - Cover the storage area with a roof.
  - Minimize stormwater runon by enclosing the area or building a berm around it.
  - Use a “doghouse” structure for storage of liquid containers.
  - Use covered dumpsters for waste product containers.

- Employ safeguards against accidental releases:
  - Provide overflow protection devices to warn operator or automatic shut down transfer pumps.
  - Provide protection guards (bollards) around tanks and piping to prevent vehicle or forklift damage, and
  - Provide clear tagging or labeling, and restricting access to valves to reduce human error.

- Berm or surround tank or container with secondary containment system using dikes, liners, vaults, or double walled tanks.

- Contact the appropriate regulatory agency regarding environmental compliance for facilities with “spill ponds” designed to intercept, treat, and/or divert spills.

- Have registered and specifically trained professional engineers can identify and correct potential problems such as loose fittings, poor welding, and improper or poorly fitted gaskets for newly installed tank systems.

Storage Areas

- Provide storage tank piping located below product level with a shut-off valve at the tank; ideally this valve should be an automatic shear valve with the shut-off located inside the tank.

- Provide barriers such as posts or guard rails, where tanks are exposed, to prevent collision damage with vehicles.

- Provide secure storage to prevent vandalism.

- Place tight-fitting lids on all containers.

- Enclose or cover the containers where they are stored.
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- Raise the containers off the ground by use of pallet or similar method, with provisions for spill control and secondary containment.

- Contain the material in such a manner that if the container leaks or spills, the contents will not discharge, flow, or be washed into the storm drainage system, surface waters or groundwater.

- Place drip pans or absorbent materials beneath all mounted container taps, and at all potential drip and spill locations during filling and unloading of containers. Drip pans must be cleaned periodically, and all collected liquids and soiled absorbent materials must be reused/recycled or properly disposed.

- Ensure that any underground or aboveground storage tanks shall be designed and managed in accordance with applicable regulations, be identified as a potential pollution source, have secondary containment, such as a berm or dike with an impervious surface.

- Rainfall collected in secondary containment system must not contain pollutants for discharge to storm drain system.

**Container Management**

- Keep containers in good condition without corrosion or leaky seams.

- Place containers in a lean-to structure or otherwise covered to keep rainfall from reaching the drums.

- Replace containers if they are deteriorating to the point where leakage is occurring. Keep all containers undercover to prevent the entry of stormwater. Employees should be made aware of the importance of keeping the containers free from leaks.

- Keep waste container drums in an area such as a service bay. Drums stored outside must be stored in a lean-to type structure, shed or walk-in container.

**Storage of Hazardous Materials**

- Storage of reactive, ignitable, or flammable liquids must comply with the fire and hazardous waste codes.

- Place containers in a designated area that is paved, free of cracks and gaps, and impervious in order to contain leaks and spills. The area should also be covered.

- Surround stored hazardous materials and waste with a curb or dike to provide the volume to contain 10 percent of the volume of all of the containers or 110 percent of the volume of the largest container, whichever is greater. The area inside the curb should slope to a drain and a dead-end sump should be installed in the drain.

**Inspection**

- Provide regular inspections:
  - Inspect storage areas regularly for leaks or spills.
- Conduct routine inspections and check for external corrosion of material containers. Also check for structural failure, spills and overfills due to operator error, failure of piping system.

- Check for leaks or spills during pumping of liquids or gases from truck or rail car to a storage facility or vice versa.

- Visually inspect new tank or container installations for loose fittings, poor welding, and improper or poorly fitted gaskets.

- Inspect tank foundations, connections, coatings, and tank walls and piping system. Look for corrosion, leaks, cracks, scratches, and other physical damage that may weaken the tank or container system.

- Replace containers that are leaking, corroded, or otherwise deteriorating with ones in good condition. If the liquid chemicals are corrosive, containers made of compatible materials must be used instead of metal drums.

- Label new or secondary containers with the product name and hazards.

**Training**
- Train employees (e.g. fork lift operators) and contractors in proper spill containment and cleanup. The employee should have the tools and knowledge to immediately begin cleaning up a spill if one should occur.

- Train employees in proper storage measures.

- Use a training log or similar method to document training.

**Spill Response and Prevention**
- Keep your Spill Prevention Control and Countermeasure (SPCC) Plan up-to-date, and implement accordingly.

- Have an emergency plan, equipment and trained personnel ready at all times to deal immediately with major spills.

- Collect all spilled liquids and properly dispose of them.

- Employees trained in emergency spill cleanup procedures should be present when dangerous waste, liquid chemicals, or other wastes are delivered.

- Operator errors can be prevented by using engineering safe guards and thus reducing accidental releases of pollutant.

- Store and maintain appropriate spill cleanup materials in a location known to all near the tank storage area.

- See Aboveground Tank Leak and Spill Control section of the Spill Prevention, Control & Cleanup fact sheet (SC-11) for additional information.
*Other Considerations*
- Storage sheds often must meet building and fire code requirements.
- The local fire district must be consulted for limitations on clearance of roof covers over containers used to store flammable materials.
- All specific standards set by federal and state laws concerning the storage of oil and hazardous materials must be met.
- Storage of reactive, ignitable, or flammable liquids should comply with the Uniform Fire Code and the National Electric Code.
- Storage of oil and hazardous materials must meet specific federal and state standards including:
  - Spill Prevention Control and Countermeasure Plan (SPCC) Plan
  - Secondary containment
  - Integrity and leak detection monitoring
  - Emergency preparedness plans

*Requirements*

*Costs*
- Will vary depending on the size of the facility and the necessary controls, such as berms or safeguards against accidental controls.

*Maintenance*
- Conduct weekly inspection.
- Sweep and clean the storage area regularly if it is paved, do not hose down the area to a storm drain.

*Supplemental Information*
- The most common causes of unintentional releases are:
  - Installation problems,
  - Failure of piping systems (pipes, pumps, flanges, couplings, hoses, and valves),
  - External corrosion and structural failure,
  - Spills and overfills due to operator error, and
  - Leaks during pumping of liquids or gases from truck or rail car to a storage tank or vice versa
Further Detail of the BMP

Dikes

One of the best protective measures against contamination of stormwater is diking. Containment dikes are berms or retaining walls that are designed to hold spills. Diking is an effective pollution prevention measure for above ground storage tanks and railcar or tank truck loading and unloading areas. The dike surrounds the area of concern and holds the spill, keeping spill materials separated from the stormwater side of the dike area. Diking can be used in any industrial or municipal facility, but it is most commonly used for controlling large spills or releases from liquid storage areas and liquid transfer areas.

- For single-wall tanks, containment dikes should be large enough to hold the contents of the storage tank for the facility plus rain water.
- For trucks, diked areas should be capable of holding an amount equal to the volume of the tank truck compartment. Diked construction material should be strong enough to safely hold spilled materials.
- Dike materials can consist of earth, concrete, synthetic materials, metal, or other impervious materials.
- Strong acids or bases may react with metal containers, concrete, and some plastics.
- Where strong acids or bases or stored, alternative dike materials should be considered. More active organic chemicals may need certain special liners for dikes.
- Dikes may also be designed with impermeable materials to increase containment capabilities.
- Dikes should be inspected during or after significant storms or spills to check for washouts or overflows.
- Regular checks of containment dikes to insure the dikes are capable of holding spills should be conducted.
- Inability of a structure to retain stormwater, dike erosion, soggy areas, or changes in vegetation indicate problems with dike structures. Damaged areas should be patched and stabilized immediately.
- Accumulated stormwater in the containment are should be analyzed for pollutants before it is released to surface waters. If pollutants are found or if stormwater quality is not determined, then methods other than discharging to surface waters should be employed (e.g., discharge to sanitary sewer if allowed).
- Earthen dikes may require special maintenance of vegetation such as mulching and irrigation.
Curbing

Curbing is a barrier that surrounds an area of concern. Curbing is similar to containment diking in the way that it prevents spills and leaks from being released into the environment. The curbing is usually small scaled and does not contain large spills like diking. Curbing is common at many facilities in small areas where handling and transfer liquid materials occur. Curbing can redirect stormwater away from the storage area. It is useful in areas where liquid materials are transferred from one container to another. Asphalt is a common material used for curbing; however, curbing materials include earth, concrete, synthetic materials, metal, or other impenetrable materials.

- Spilled materials should be removed immediately from curbed areas to allow space for future spills.
- Curbs should have manually-controlled pump systems rather than common drainage systems for collection of spilled materials.
- The curbed area should be inspected regularly to clear clogging debris.
- Maintenance should also be conducted frequently to prevent overflow of any spilled materials as curbed areas are designed only for smaller spills.
- Curbing has the following advantages:
  - Excellent runon control,
  - Inexpensive,
  - Ease of installment,
  - Provides option to recycle materials spilled in curb areas, and
  - Common industry practice.

Examples

The “doghouse” design has been used to store small liquid containers. The roof and flooring design prevent contact with direct rain or runoff. The doghouse has two solid structural walls and two canvas covered walls. The flooring is wire mesh about secondary containment. The unit has been used successfully at Lockheed Missile and Space Company in Sunnyvale.

References and Resources

http://www.nalms.org/bclss/storage.html

King County Stormwater Pollution Control Manual –
http://dnr.metrokc.gov/wlr/dss/spcm.htm
San Diego Stormwater Co-permittees Jurisdictional Urban Runoff Management Program (URMP) -