Title: Drums and Abandoned Containers Emergency

Purpose:

To establish procedures and provide guidance to the Hazardous Materials Response Team when they respond to an incident involving drums or abandoned containers that may or may not be leaking.

Policy:

This procedure will apply to all incidents where the Hazardous Materials Response Team responds to incidents where storage/shipping drums and similar containers are involved that contain or are suspected of containing hazardous materials. It is the intent of this policy to comply with the requirements of OSHA 29 CFR 1910.10.120 and EPA 40 CFR Part 311 for emergency response to actual or suspected discharges of hazardous materials.

Applicability:

This policy shall be utilized to guide selection, use of the appropriate equipment, and procedures in performing hazardous materials identification and control measures for drums and abandoned containers.

These procedures will address two types of situations:

1. Drums and abandoned containers not leaking.
2. Drums and abandoned containers that are leaking.

The Hazardous Materials Group Supervisor is responsible for making sure the Incident Commander is aware of the hazards involved and the Hazardous Materials Response Team follow these guidelines in assuring the safety of the Hazardous Materials Response Team members, operations personnel, and the general public.

Procedures:

The area should be secured and command established prior to doing any inspection or handling of drums or abandoned containers.

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Drums and containers not leaking

1. All unmarked drums and abandoned containers should be considered as containing hazardous materials until proven otherwise.
2. Drums and abandoned containers can be under pressure.
3. Always use full protective gear when working with unknown drums or containers.
4. Try to obtain as much information as possible about container from people in the area or from person who made notification.
5. Examine the drum or container from a distance using binoculars prior to approaching. Check for labels, markings, bungs, relief devices, seals, plugs, leakage, deterioration of container, and bulging. Also note any visible vapors.
6. Secure the area and place visible barriers or markings to establish zones.
7. Establish decontamination sector prior to entry.
8. Full protective equipment should be used when approaching an abandoned drum or container. Level 'B' should be considered as minimum and would normally be considered adequate for drum out in the open.
9. Initial monitoring should concentrate on checking for the presence of radioactivity, flammable vapors, elevated oxygen, and corrosive vapors. If radioactive follow radiation protocol.
10. If initial monitoring does not give any indications, determine if further testing or examination is needed. Use of thermal imaging camera may be helpful in evaluating drum/container. Temperature differences on the surface of the container can provide clues to the contents.
11. Drums and abandoned containers should only be handled if necessary. Contents should be classified or characterized prior to moving a drum/container.
12. Drums that appear to be under pressure should be opened by remote means.
13. All Lab Packs should be considered to be explosive or shock-sensitive until proven otherwise.

Leaking drums and abandoned containers

1. If possible raise any leaking hole in drum above the level of liquid in container.

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2. Make sure any material to be used to patch, plug or stop a leak is compatible with the product in the drum.
3. Patched or plugged drums should be placed inside a recovery drum. Absorbent pads should be placed with the drum when over-packed to collect any leaking material.
4. If placing drum inside a metal recovery drum consider bagging the drum first.
5. Properly mark the recovery drum for transport and disposal.
6. Decide whether referral will be done or further action such as testing of contents and movement of container.
7. Location of the container, its contents, and if leaking will determine whether it needs to be moved. This also determines if it can be over-packed or not.
8. If sampling and field testing is done then the container should be marked as to the main hazard identified. Use non-sparking bung opener and tools to open container.
9. If a container is leaking, then repositioning, patching, plugging, and over-packing can be used. Transferring the product from the leaking container can also be used to control leak. Make sure pump for transfer is designed for and compatible with the product.

Additional Requirements:

- No container should be left on scene unless it has been determined it is safe to leave it and that it has been secured against tampering. If it remains on scene then it should be secured until picked up or transferred to another agency. (refer to DEP guidelines)
- If a drum or container was found to be leaking then ground samples should be taken unless the drum/container was on a non-permeable surface.