

Maintenance Advisory

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Guidance for Storage of Empty Drums

In the past, there have been issues with the storing of empty drums for use in maintenance activities. These issues include:

- Storing large numbers of so-called empty drums in a random fashion.
- Storing drums on the bare ground in a back area of the facility yard.
- Storing drums in a way that precipitation can get into the drums, potentially overflowing onto the ground or in a way that allows paint chips, emulsion, fuel oil, or other materials to spill onto the ground.
- Storing drums in wet areas where they are constantly exposed to moisture, allowing materials to leach into the water and potentially into the soil.

Recommendations for good storage are:

1. Only keep as many drums as needed for the immediate future (within the next year). Long-term outdoor storage of drums eventually leads to rusty drums which will have limited usefulness. Minimize the number. Properly dispose of excess drums.
2. If possible, keep drums stored neatly under cover and on a hard surface rather than on bare soil. Be sure that the drums are stored in such a way that they do not present a fire hazard, are not in the way, and do not give off excessive vapors where workers might be exposed.
3. If drums must be stored outside, be sure they are tightly closed (with lids or bungs in place) or otherwise stored to keep out precipitation, and to avoid losing any material (paint chips, etc.) to the ground surface.
4. Empty drums and containers should not be left open and exposed to rainfall. Should rainfall accumulate in an empty container, the liquids must be properly characterized and disposed of according to applicable regulations.
5. Be sure that the drums are obviously empty to someone such as a regulatory person who may be inspecting the facility. If it isn't obvious that all the drums are empty, a regulatory person may assume they contain hazardous materials or hazardous wastes which have specific requirements for handling.
6. Be sure to remove any old labels, and label the drums as empty.
7. Properly dispose of rusty, banged up drums.
8. Drums containing resin or residue that cannot be removed must be disposed of in a similar manner to the original material contained in the drum.