

Storage Facilities



Issue Date: August 2018

DRUM STORAGE AND MANAGEMENT

SCM-PP/GH-9



Description

Storage drums are used for chemicals needed for municipal operations. These sources have the potential of introducing pollutants into stormwater runoff if not maintained and used properly.

NYC MS4 SPDES Permit Requirement(s)	IV.E Construction Site Controls IV.G Pollution Prevention/Good Housekeeping for Municipal Operations and Facilities IV.H Industrial/Commercial Sources
KEY SELECTION CRITERIA	
Targeted Activities	<ul style="list-style-type: none"> • Drum storage area or facility operation & maintenance • Transfer of drum contents
Performance Goals	<ul style="list-style-type: none"> • Minimize potential for release or accidental discharge of drum contents • Minimize pollutants entering storm sewers & waterways • Implement good housekeeping practices
Most Effective Controls <small>(more detail on page 2)</small>	<ul style="list-style-type: none"> • Store drums in designated, covered/protected area • Capture and properly dispose of wastes & spilled material • Use dry cleaning methods to reduce stored liquid waste
RELATED CONTROL MEASURES AND REGULATIONS	
Related SCMs	<ul style="list-style-type: none"> • SCM-PP/GH-6 • SCM-PP/GH-7 • SCM-PP/GH-8 • SCM-PP/GH-10 • SCM-PP/GH-19 • SCM-PP/GH-26 • SCM-PP/GH-33
Other Regulatory Requirements*	<ul style="list-style-type: none"> • 40 CFR 280 • 6 NYCRR Part 597

EFFECTIVENESS FOR TARGETED POLLUTANTS / IMPAIRMENTS

	Floatables
	Sediments
✓	Nitrogen
✓	Phosphorus
	Pathogens
✓	Oxygen Demand
	PCBs
✓	Metals
✓✓	Petroleum Products/PAHs

✓✓ = Good ✓ = Fair = Poor

CONTROL STRATEGIES

✓	Cover/Contain
✓	Clean Up
✓	Reduce/Minimize
	Product Substitutions
✓	Manage Runoff
✓	Capture/Treat/Dispose

✓ = Yes

*Note: RCNY: Rules of the City of New York; NYCRR: New York Codes, Rules and Regulations; CFR: Code of Federal Regulations

Listed regulatory requirements are not inclusive of all legal requirements applicable to NYC facilities. Local, state, and/or federal regulations should be consulted to ensure full regulatory compliance.

Control Strategies/Suggested Practices

COVER/CONTAIN

- Establish designated, indoor or covered drum storage areas, as feasible.
- Place adequate secondary containment sufficient to capture emptied drum volumes.
- Water soluble solids should be stored in drums and protected from stormwater.

CLEAN UP

- Clean up spills properly using a dry, absorbent, and approved material (e.g., Speedy Dry).
- Avoid flushing spills into storm sewer systems or any areas that discharge to waterways.
- Keep spill response kit near storage area.

REDUCE/MINIMIZE

- Develop spill prevention and control procedures for materials stored or used in areas exposed to stormwater and/or that could run off into a storm drain.
- Ensure there is adequate storage available when placing materials into the drums.
- Hook-ups and gaskets should be used properly and sealed to prevent leaks.
- Keep storage area clear of all materials that may cause damage to the drum.
- Establish a schedule for regular inspection of drums, hoses, and fittings for leaks or damage.
- Observe for evidence of pollutants entering the drainage systems or waterways from storage areas.
- Minimize risk of spills by storing only the amount needed for operations.

PRODUCT SUBSTITUTION

N/A

MANAGE RUNOFF

- Avoid storing drums near open storm drains or areas that sheet flow directly into water bodies.
- Seal drains that discharge to storm drains, where feasible, or insert filters in adjacent catch basins.
- Minimize stormwater runoff from adjacent areas using berms, absorbent booms, or other practices.

CAPTURE/TREAT/DISPOSE

- Do not use fluids or wash water during spill cleanup. If unavoidable, all fluids and wash water from spill cleanup must be disposed of properly and not into storm sewer drains.

References

1. FDNY Emergency Notification Procedures for Gasoline Leaks or Spills, A.U.C. 211, March 1997
2. FDNY, Bureau of EMS, Safely Dispensing Fuel, February 2011
3. City of New York, DOC, Directive 3900R – Environmental Health Program, April 2014
4. NYS DEC, SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, Permit No. GP-0-17-004, March 2018
5. NYS DEC, Chemical Bulk Storage Inspection Report, August 2006
6. NYS DEC, Petroleum Bulk Storage (PBS) Inspection Form v.4, July 2009
7. NYS DEC, Major Oil Storage Facility, Site Inspection Report, August 2006
8. City of New York, DPR, Garage Good Housekeeping Procedures, 2010