11. Handling Drums and Other Containers

Contents

Introduction

Accidents may occur during handling of drums and other hazardous waste containers. Hazards include detonations, fires, explosions, vapor generation, and physical injury resulting from moving heavy containers by hand and working around stacked drums, heavy equipment, and deteriorated drums. While these hazards are always present, proper work practices—such as minimizing handling and using equipment and procedures that isolate workers from hazardous substances—can minimize the risks to site personnel.

This chapter defines practices and procedures for safe handling of drums and other hazardous waste containers. It is intended to aid the Project Team Leader in setting up a waste container handling program. In addition to reading this chapter, the Project Team Leader should also be aware of all pertinent regulations. OSHA regulations (29 CFR Parts 1910 and 1926) include general requirements and standards for storing, containing, and handling chemicals and containers, and for maintaining equipment used for handling materials. EPA regulations (40 CFR Part 265) stipulate requirements for types of containers, maintenance of containers and containment structures, and design and maintenance of storage areas. DOT regulations (49 CFR Parts 171 through 178) also stipulate requirements for containers and procedures for shipment of hazardous wastes.

Containers are handled during characterization and removal of their contents and during other operations. A flow chart showing one set of possible procedures for drum handling is given in Figure 11-1. Guidance for safely performing the procedures shown in Figure 11-1 is provided in the following sections of this chapter. The final section, *Special Case Problems*, describes the handling of tanks, vaults, vacuum trucks, elevated tanks, and compressed gas cylinders.

Inspection

The appropriate procedures for handling drums depend on the drum contents. Thus, prior to any handling, drums should be visually inspected to gain as much information as possible about their contents. The inspection crew should look for:

- Symbols, words, or other marks on the drum indicating that its contents are hazardous, e.g., radioactive, explosive, corrosive, toxic, flammable.
- Symbols, words, or other marks on a drum indicating that it contains discarded laboratory chemicals, reagents, or other potentially dangerous materials in small-volume individual containers (see Table 11-1).
- Signs of deterioration such as corrosion, rust, and leaks.
- Signs that the drum is under pressure such as swelling and bulging.
- Drum type (see Table 11-1).
- Configuration of the drumhead (see Table 11-2).

Conditions in the immediate vicinity of the drums may provide information about drum contents and their associated hazards. Monitoring should be conducted around the drums using instruments such as a gamma radiation survey instrument, organic vapor monitors, and a combustible gas meter.

The results of this survey can be used to classify the drums into preliminary hazard categories, for example:

- Radioactive.
- Leaking/deteriorated.
- Bulging.
- Explosive/shock-sensitive.
- Contains small-volume individual containers of laboratory wastes or other dangerous materials.

As a precautionary measure, personnel should assume that unlabelled drums contain hazardous materials until their contents are characterized. Also, they should bear in mind that drums are frequently mislabelled—particularly drums that are reused. Thus, a drum's label may not accurately describe its contents.

If buried drums are suspected, ground-penetrating systems, such as electromagnetic wave, electrical resistivity, ground-penetrating radar, magnetometry, and metal detection, can be used to estimate the location and depth of the drums.

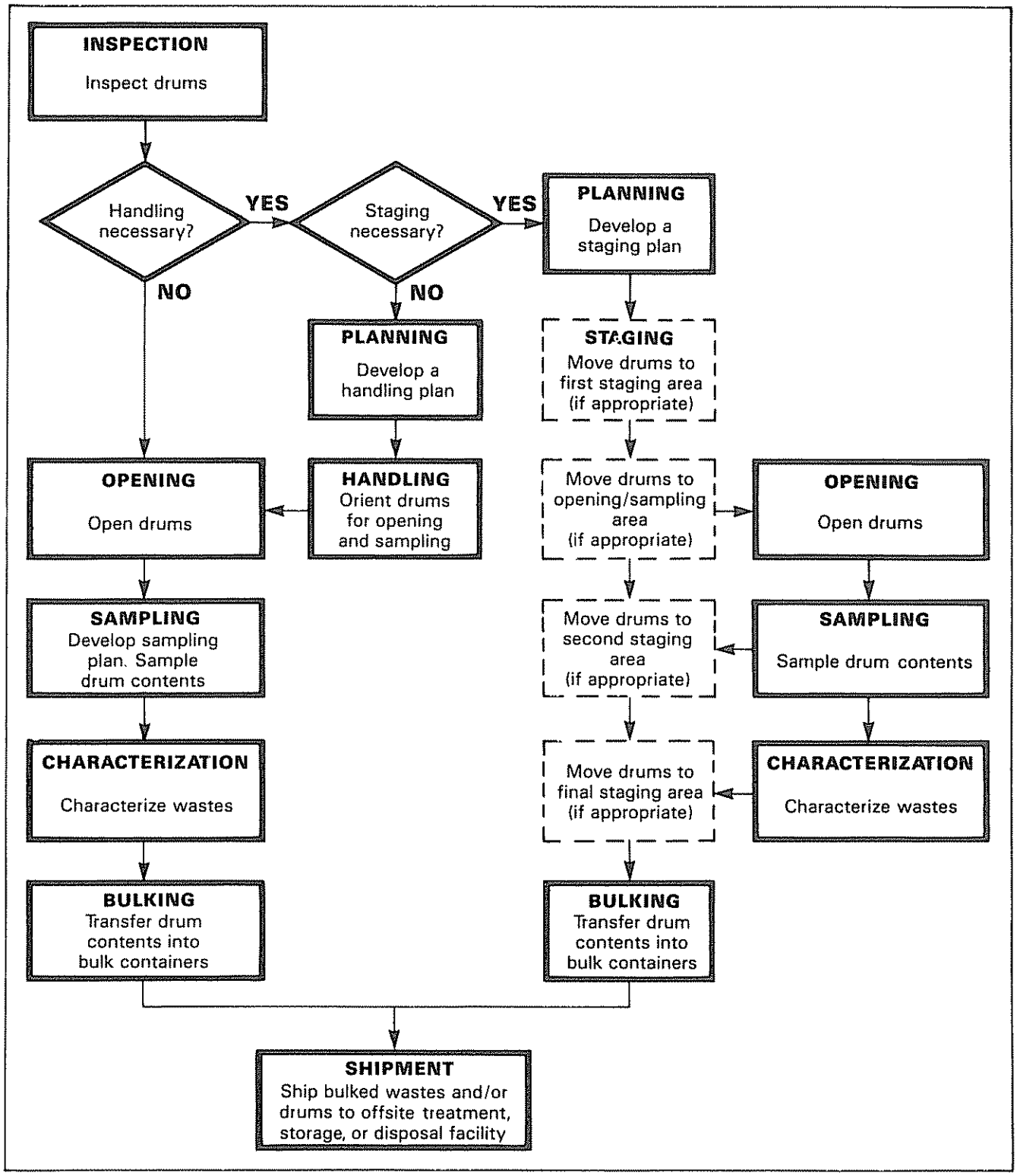


Figure 11-1. Flow Chart for Drum Handling. (Dashed boxes indicate optional steps. Number of staging areas necessary is site specific.)

Table 11-1. Special Drum Types and Their Associated Hazards

Polyethylene or PVC-Lined Drums	Often contain strong acids or bases. If the lining is punctured, the substance usually quickly corrodes the steel, resulting in a significant leak or spill.
Exotic Metal Drums (e.g., aluminum, nickel, stainless, steel, or other unusual metal)	Very expensive drums that usually contain an extremely dangerous material
Single-Walled Drums Used as a Pressure Vessel	These drums have fittings for both product filling and placement of an inert gas, such as nitrogen. May contain reactive, flammable, or explosive substances.
Laboratory Packs	Used for disposal of expired chemicals and process samples from university laboratories, hospitals, and similar institutions. Individual containers within the lab pack are often not packed in absorbent material. They may contain incompatible materials, radioisotopes, shock-sensitive, highly volatile, highly corrosive, or very toxic exotic chemicals. Laboratory packs can be an ignition source for fires at hazardous waste sites.

Table 11-2. Information Provided by Drumhead Configuration

CONFIGURATION	INFORMATION
Whole lid removable.	Designed to contain solid material.
Has a bung.	Designed to contain a liquid.
Contains a liner.	May contain a highly corrosive or otherwise hazardous material.

Planning

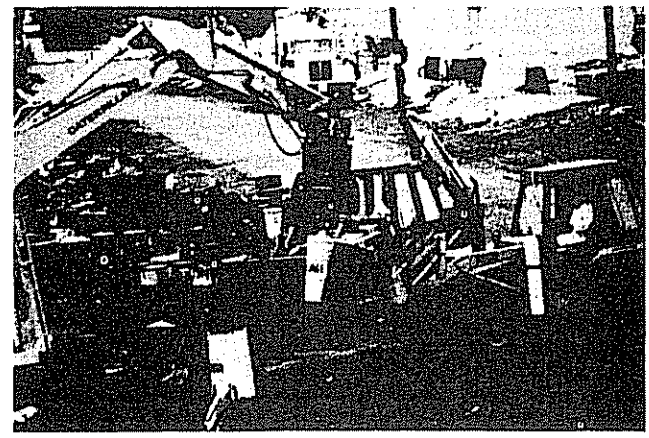
Since drum handling is fraught with danger, every step of the operation should be carefully planned, based on all the information available at the time. The results of the preliminary inspection can be used to determine (1) if any hazards are present and the appropriate response, and (2) which drums need to be moved in order to be opened and sampled. A preliminary plan should be developed which specifies the extent of handling necessary, the personnel selected for the job, and the most appropriate procedures based on the hazards associated with the probable drum contents as determined by visual inspection. This plan should be revised as new information is obtained during drum handling.

Handling

The purpose of handling is to (1) respond to any obvious problems that might impair worker safety, such as radioactivity, leakage, or the presence of explosive substances, (2) unstack and orient drums for sampling, and (3) if necessary, to organize drums into different areas on site to facilitate characterization and remedial action (see *Staging* in this chapter). Handling may or may not be necessary, depending on how the drums are positioned at a site.

Since accidents occur frequently during handling, particularly initial handling, drums should only be handled if necessary. Prior to handling, all personnel should be warned about the hazards of handling, and instructed to minimize handling as much as possible and to avoid unnecessary handling. In all phases of handling, personnel should be alert for new information about potential hazards. These hazards should be responded to before continuing with more routine handling operations. Overpack drums (larger drums in which leaking or damaged drums are placed for storage or shipment [see 49 CFR Part 173.3(c)]) and an adequate volume of absorbent should be kept near areas where minor spills may occur. Where major spills may occur, a containment berm adequate to contain the entire volume of liquid in the drums should be constructed before any handling takes place. If the drum contents spill, personnel trained in spill response should be used to isolate and contain the spill.

Several types of equipment can be used to move drums: (1) A drum grappler attached to a hydraulic excavator; (2) a small front-end loader, which can be either loaded manually or equipped with a bucket sling; (3) a rough terrain forklift; (4) a roller conveyor equipped with solid rollers; and (5) drum carts designed specifically for drum handling. Drums are also sometimes moved manually. The drum grappler is the preferred piece of equipment for drum handling. It keeps the operator removed from the drums so that there is less likelihood of injury if the drums detonate or rupture. If a drum is leaking, the operator can stop the leak by rotating the drum and immediately placing it into an overpack. In case of an explosion, grappler claws help protect the operator by partially deflecting the force of the explosion.



Backhoe with drum grappler.

The following procedures can be used to maximize worker safety during drum handling and movement:

- Train personnel in proper lifting and moving techniques to prevent back injuries.
- Make sure the vehicle selected has sufficient rated load capacity to handle the anticipated loads, and

make sure the vehicle can operate smoothly on the available road surface.

- Air condition the cabs of vehicles to increase operator efficiency; protect the operator with heavy splash shields.
- Supply operators with appropriate respiratory protective equipment when needed. Normally either a combination SCBA/SAR with the air tank fastened to the vehicle, or an airline respirator and an escape SCBA are used because of the high potential hazards of drum handling. This improves operator efficiency and provides protection in case the operator must abandon the equipment.
- Have overpacks ready before any attempt is made to move drums.
- Before moving anything, determine the most appropriate sequence in which the various drums and other containers should be moved. For example, small containers may have to be removed first to permit heavy equipment to enter and move the drums.
- Exercise extreme caution in handling drums that are not intact and tightly sealed.
- Ensure that operators have a clear view of the roadway when carrying drums. Where necessary, have ground workers available to guide the operator's motion.

Drums Containing Radioactive Waste

- If the drum exhibits radiation levels above background (see Table 6-2), immediately contact a health physicist. Do *not* handle any drums that are determined to be radioactive until persons with expertise in this area have been consulted.

Drums that May Contain Explosive or Shock-Sensitive Waste

- If a drum is suspected to contain explosive or shock-sensitive waste as determined by visual inspection, seek specialized assistance before any handling.
- If handling is necessary, handle these drums with *extreme caution*.
- Prior to handling these drums, make sure all non-essential personnel have moved a safe distance away.
- Use a grappler unit constructed for explosive containment for initial handling of such drums.
- Palletize the drums prior to transport. Secure drums to pallets.
- Use an audible siren signal system, similar to that employed in conventional blasting operations, to signal the commencement and completion of explosive waste handling activities.
- Maintain continuous communication with the Site Safety Officer and/or the command post until drum handling operations are complete.

Bulging Drums

- Pressurized drums are extremely hazardous. Wherever possible, do not move drums that may be under internal pressure, as evidenced by bulging or swelling.
- If a pressurized drum has to be moved, whenever possible handle the drum with a grappler unit constructed for explosive containment. Either move the bulged drum only as far as necessary to allow seating on firm ground, or carefully overpack the drum. Exercise extreme caution when working with or adjacent to potentially pressurized drums.

Drums Containing Packaged Laboratory Wastes (Lab Packs)

Laboratory packs (i.e., drums containing individual containers of laboratory materials normally surrounded by cushioning absorbent material) can be an ignition source for fires at hazardous waste sites. They sometimes contain shock-sensitive materials. Such containers should be considered to hold explosive or shock-sensitive wastes until otherwise characterized. If handling is required, the following precautions are among those that should be taken:

- Prior to handling or transporting lab packs, make sure all non-essential personnel have moved a safe distance away.
- Whenever possible, use a grappler unit constructed for explosive containment for initial handling of such drums.
- Maintain continuous communication with the Site Safety Officer and/or the command post until handling operations are complete.
- Once a lab pack has been opened, have a chemist inspect, classify, and segregate the bottles within it, without opening them, according to the hazards of the wastes. An example of a system for classifying lab pack wastes is provided in Table 11-3. The objective of a classification system is to ensure safe segregation of the lab packs' contents. Pack these bottles with sufficient cushioning and absorption materials to prevent excessive movement of the bottles and to absorb all free liquids, and ship them to an approved disposal facility.
- If crystalline material is noted at the neck of any bottle, handle it as a shock-sensitive waste, due to the potential presence of picric acid or other similar material, and get expert advice before attempting to handle it.
- Palletize the repacked drums prior to transport. Secure the drums to pallets.

Leaking, Open, and Deteriorated Drums

- If a drum containing a liquid cannot be moved without rupture, immediately transfer its contents to a sound drum using a pump designed for transfering that liquid.
- Using a drum grappler, place immediately in overpack containers:

  Leaking drums that contain sludges or semi-solids.

  Open drums that contain liquid or solid waste.

  Deteriorated drums that can be moved without rupture.

Table 11-3. Example of Lab Pack Content Classification System for Disposal

CLASSIFICATION	EXAMPLES
Inorganic acids	Hydrochloric Sulfuric
Inorganic bases	Sodium hydroxide Potassium hydroxide
Strong oxidizing agents	Ammonium nitrate Barium nitrate Sodium chlorate Sodium peroxide
Strong reducing agents	Sodium thiosulfate Oxalic acid Sodium sulphite
Anhydrous organics and organometallics	Tetraethyl lead Phenylmercuric chloride
Anhydrous inorganics and metal hydrides	Potassium hydride Sodium hydride Sodium metal Potassium
Toxic organics	PCBs Insecticides
Flammable organics	Hexane Toluene Acetone
Inorganics	Sodium carbonate Potassium chloride
Inorganic cyanides	Potassium cyanide Sodium cyanide Copper cyanide
Organic cyanides	Cyanoacetamide
Toxic metals	Arsenic Cadmium Lead Mercury

Buried Drums

- Prior to initiating subsurface excavation, use ground-penetrating systems to estimate the location and depth of the drums (see *Inspection* in this chapter).
- Remove soil with great caution to minimize the potential for drum rupture.
- Have a dry chemical fire extinguisher on hand to control small fires.

Opening

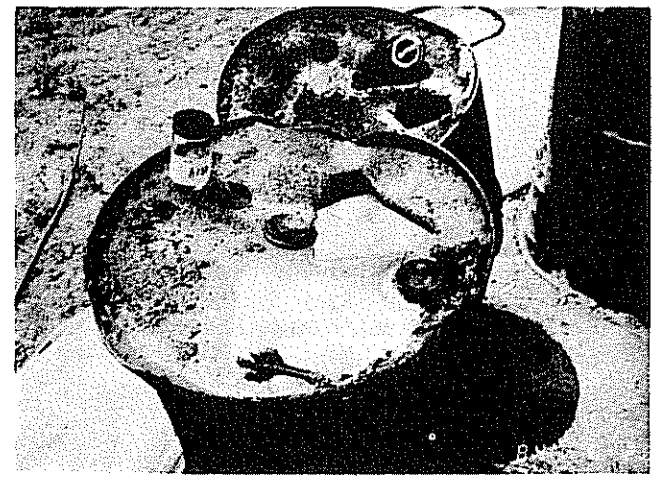
Drums are usually opened and sampled in place during site investigations. However, remedial and emergency operations may require a separate drum opening area (see *Staging* in this chapter). Procedures for opening drums are the same, regardless of where the drums are opened. To enhance the efficiency and safety of drum-opening personnel, the following procedures should be instituted.

- If a supplied-air respiratory protection system is used, place a bank of air cylinders outside the work area and supply air to the operators via airlines and escape SCBAs. This enables workers to operate in relative comfort for extended periods of time.
- Protect personnel by keeping them at a safe distance from the drums being opened. If personnel must be located near the drums, place explosion-resistant plastic shields between them and the drums to protect them in case of detonation. Locate controls for drum opening equipment, monitoring equipment, and fire suppression equipment behind the explosion-resistant plastic shield.
- If possible, monitor continuously during opening. Place sensors of monitoring equipment, such as colorimetric tubes, dosimeters, radiation survey instruments, explosion meters, organic vapor analyzers, and oxygen meters, as close as possible to the source of contaminants, i.e., at the drum opening.
- Use the following remote-controlled devices for opening drums:

  Pneumatically operated impact wrench to remove drum bungs.

  Hydraulically or pneumatically operated drum piercers (see Figure 11-2).

  Backhoes equipped with bronze spikes for penetrating drum tops in large-scale operations (see Figure 11-3).
- Do *not* use picks, chisels and firearms to open drums.
- Hang or balance the drum opening equipment to minimize worker exertion.
- If the drum shows signs of swelling or bulging, perform all steps slowly. Relieve excess pressure prior to opening and, if possible, from a remote location using such devices as a pneumatic impact wrench or hydraulic penetration device. If pressure must be relieved manually, place a barrier such as explosion-resistant plastic sheeting between the worker and bung to deflect any gas, liquid, or solids which may be expelled as the bung is loosened.



Two drums with rusted bungs were opened by backhoes with bronze spikes and now await sampling. Drum in foreground has been labelled "150" for sample documentation purposes.

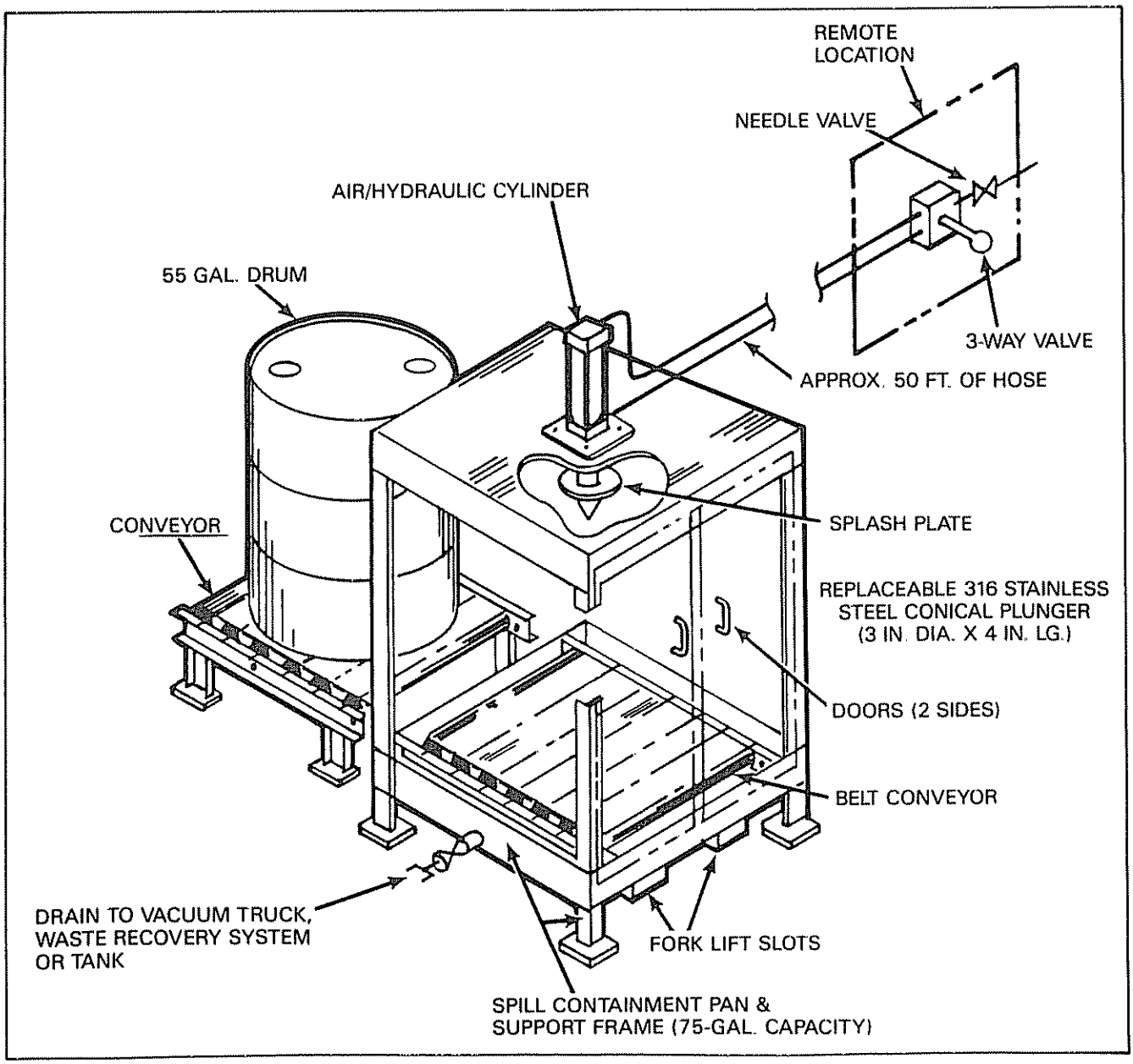


Figure 11-2. Air/Hydraulic-Operated Single-Drum Puncture Device.
Source: Reference [1].

- Open exotic metal drums and polyethylene or polyvinyl chloride-lined (PVC-lined) drums through the bung by removal or drilling. Exercise extreme caution when manipulating these containers.
- Do *not* open or sample individual containers within laboratory packs.
- Reseal open bungs and drill openings as soon as possible with new bungs or plugs to avoid explosions and/or vapor generation. If an open drum cannot be resealed, place the drum into an overpack. Plug any openings in pressurized drums with pressure-venting caps set to a 5-psi (pounds per square inch) release to allow venting of vapor pressure.
- Decontaminate equipment after each use to avoid mixing incompatible wastes.

Sampling

Drum sampling can be one of the most hazardous activities to worker safety and health because it often involves direct contact with unidentified wastes. Prior to collecting any sample, develop a sampling plan:

- Research background information about the waste.
- Determine which drums should be sampled.
- Select the appropriate sampling device(s) and container(s).

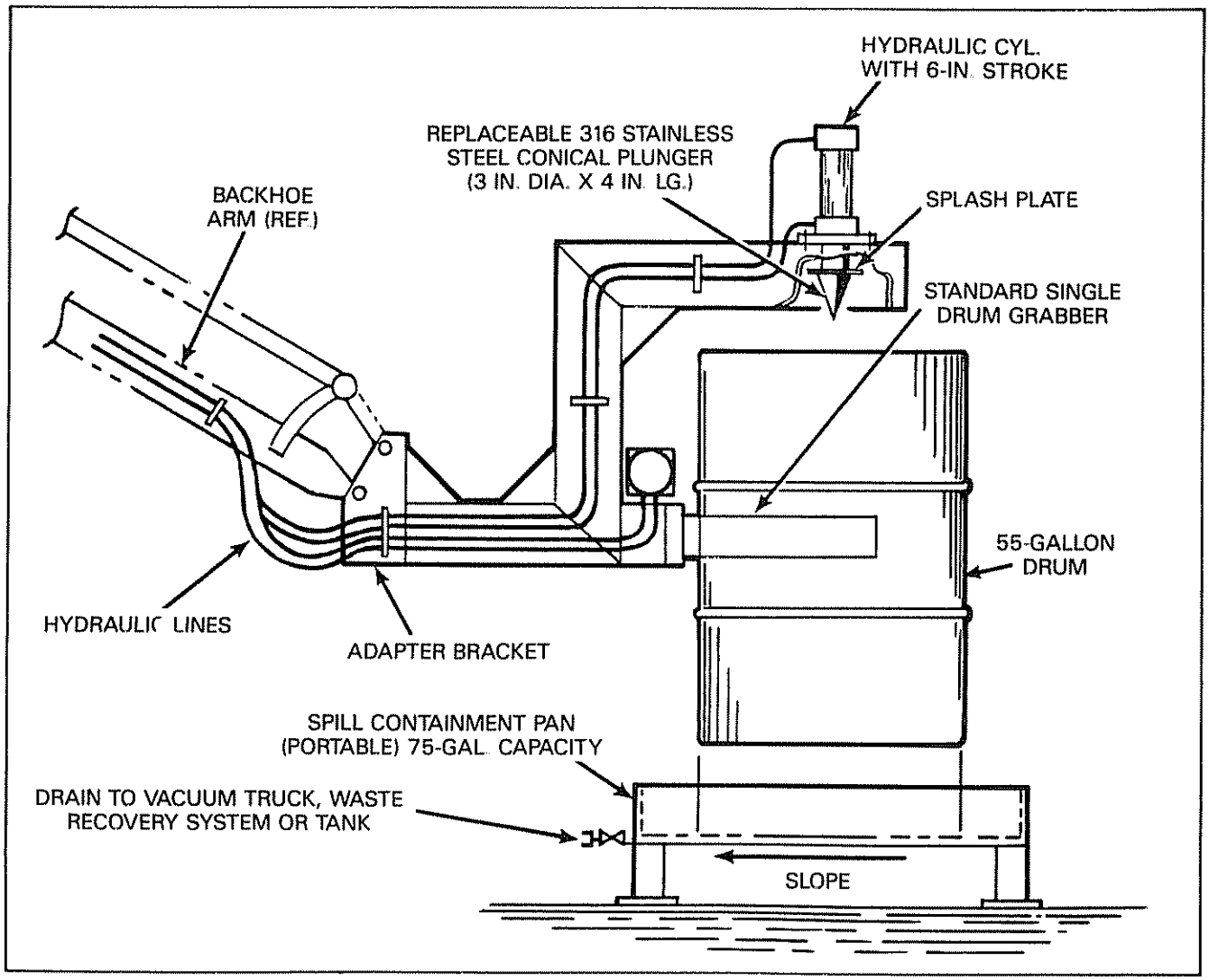


Figure 11-3. Backhoe-Mounted Drum Puncture Device.
Source: Reference [1].

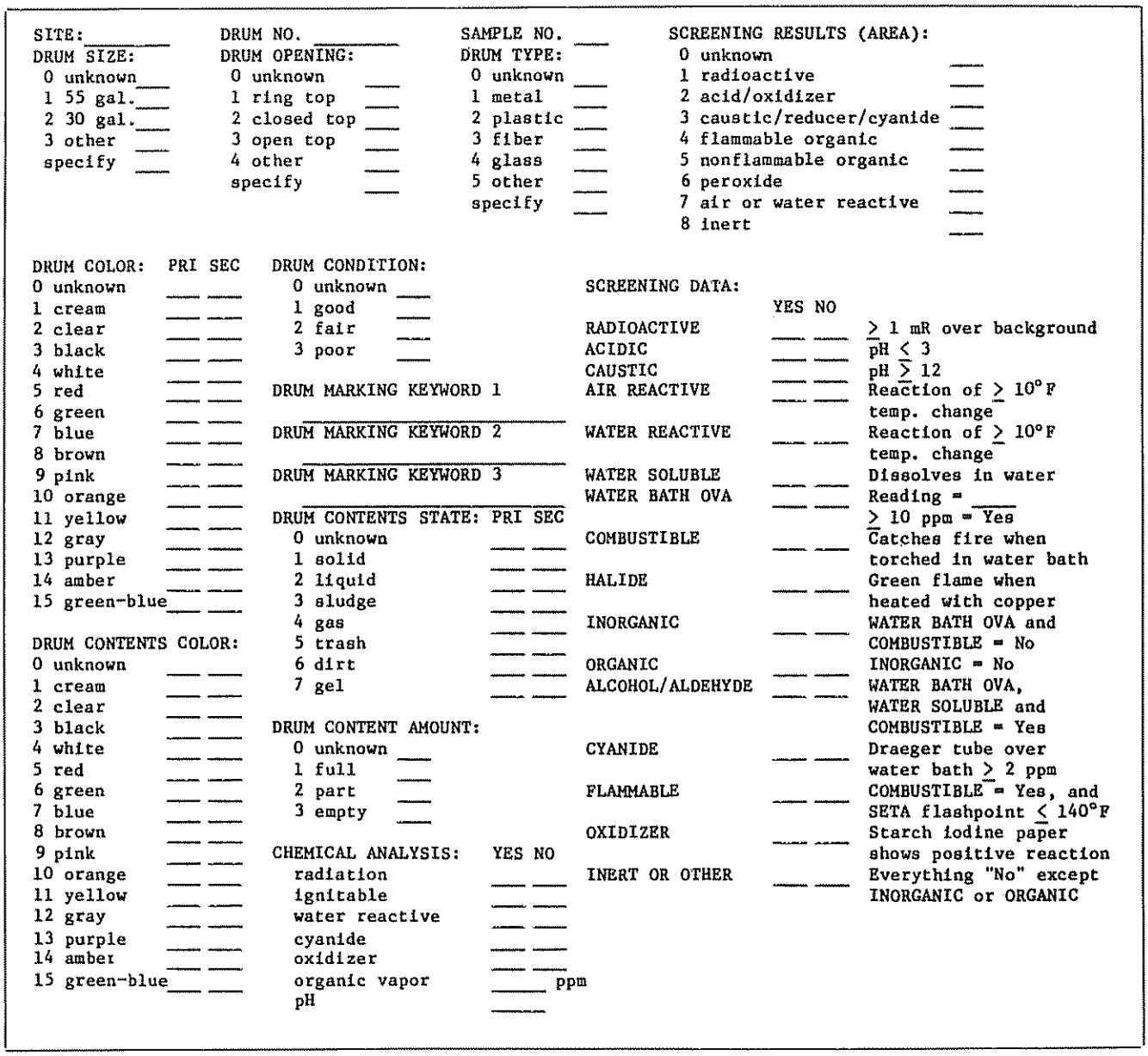
- Develop a sampling plan which includes the number, volume, and locations of samples to be taken.
- Develop Standard Operating Procedures for opening drums, sampling, and sample packaging and transportation. Some guidance in designing proper sampling procedures can be found in References [2] and [3].
- Have a trained health and safety professional determine, based on available information about the wastes and site conditions, the appropriate personal protection to be used during sampling, decontamination, and packaging of the sample.

When manually sampling from a drum, use the following techniques:

- Keep sampling personnel at a safe distance while drums are being opened. Sample only after opening operations are complete.
- Do *not* lean over other drums to reach the drum being sampled, unless absolutely necessary.
- Cover drum tops with plastic sheeting or other suitable noncontaminated materials to avoid excessive contact with the drum tops.
- *Never* stand on drums. This is extremely dangerous. Use mobile steps or another platform to achieve the height necessary to safely sample from the drums.
- Obtain samples with either glass rods or vacuum pumps. Do *not* use contaminated items such as discarded rags to sample. The contaminants may contaminate the sample and may not be compatible with the waste in the drum. Glass rods should be removed prior to pumping to minimize damage to pumps.

Characterization

The goal of characterization is to obtain the data necessary to determine how to safely and efficiently package and transport the wastes for treatment and/or disposal. If wastes are bulked, they must be sufficiently character-



SITE: _____
DRUM SIZE:
0 unknown ___
1 55 gal. ___
2 30 gal. ___
3 other ___
specify ___

DRUM NO. _____
DRUM OPENING:
0 unknown ___
1 ring top ___
2 closed top ___
3 open top ___
4 other ___
specify ___

SAMPLE NO. ___
DRUM TYPE:
0 unknown ___
1 metal ___
2 plastic ___
3 fiber ___
4 glass ___
5 other ___
specify ___

SCREENING RESULTS (AREA):
0 unknown ___
1 radioactive ___
2 acid/oxidizer ___
3 caustic/reducer/cyanide ___
4 flammable organic ___
5 nonflammable organic ___
6 peroxide ___
7 air or water reactive ___
8 inert ___

DRUM COLOR: PRI SEC
0 unknown ___ ___
1 cream ___ ___
2 clear ___ ___
3 black ___ ___
4 white ___ ___
5 red ___ ___
6 green ___ ___
7 blue ___ ___
8 brown ___ ___
9 pink ___ ___
10 orange ___ ___
11 yellow ___ ___
12 gray ___ ___
13 purple ___ ___
14 amber ___ ___
15 green-blue ___ ___

DRUM CONTENTS COLOR:
0 unknown ___ ___
1 cream ___ ___
2 clear ___ ___
3 black ___ ___
4 white ___ ___
5 red ___ ___
6 green ___ ___
7 blue ___ ___
8 brown ___ ___
9 pink ___ ___
10 orange ___ ___
11 yellow ___ ___
12 gray ___ ___
13 purple ___ ___
14 amber ___ ___
15 green-blue ___ ___

DRUM CONDITION:
0 unknown ___
1 good ___
2 fair ___
3 poor ___

DRUM MARKING KEYWORD 1
_____
DRUM MARKING KEYWORD 2
_____
DRUM MARKING KEYWORD 3
_____

DRUM CONTENTS STATE: PRI SEC
0 unknown ___ ___
1 solid ___ ___
2 liquid ___ ___
3 sludge ___ ___
4 gas ___ ___
5 trash ___ ___
6 dirt ___ ___
7 gel ___ ___

DRUM CONTENT AMOUNT:
0 unknown ___
1 full ___
2 part ___
3 empty ___

CHEMICAL ANALYSIS: YES NO
radiation ___ ___
ignitable ___ ___
water reactive ___ ___
cyanide ___ ___
oxidizer ___ ___
organic vapor _____ ppm
pH _____

SCREENING DATA:

	YES	NO	
RADIOACTIVE	___	___	≥ 1 mR over background
ACIDIC	___	___	pH < 3
CAUSTIC	___	___	pH ≥ 12
AIR REACTIVE	___	___	Reaction of ≥ 10°F temp. change
WATER REACTIVE	___	___	Reaction of ≥ 10°F temp. change
WATER SOLUBLE	___	___	Dissolves in water
WATER BATH OVA	___	___	Reading = _____ ≥ 10 ppm = Yes
COMBUSTIBLE	___	___	Catches fire when torched in water bath
HALIDE	___	___	Green flame when heated with copper
INORGANIC	___	___	WATER BATH OVA and COMBUSTIBLE = No
ORGANIC	___	___	INORGANIC = No
ALCOHOL/ALDEHYDE	___	___	WATER BATH OVA, WATER SOLUBLE and COMBUSTIBLE = Yes
CYANIDE	___	___	Draeger tube over water bath ≥ 2 ppm
FLAMMABLE	___	___	COMBUSTIBLE = Yes, and SETA flashpoint ≤ 140°F
OXIDIZER	___	___	Starch iodine paper shows positive reaction
INERT OR OTHER	___	___	Everything "No" except INORGANIC or ORGANIC

Figure 11-4. Sample Drum Characterization Sheet.
Source: EPA Region VII Emergency Planning and Response Branch.
(This figure is provided only as an example. Values were selected by EPA Region VII and should be modified as appropriate.)

ized to determine which of them can be safely combined (see *Bulking* later in this chapter). As a first step in obtaining these data, standard tests should be used to classify the wastes into general categories, including auto-reactives, water reactives, inorganic acids, organic acids, heavy metals, pesticides, cyanides, inorganic oxidizers, and organic oxidizers. In some cases, further analysis should be conducted to more precisely identify the waste materials. See Figure 11-4 for an example of a characterization sheet for drums.

When possible, materials should be characterized using an onsite laboratory. This provides data as rapidly as possible, and minimizes the time lag before appropriate action can be taken to handle any hazardous materials. Also, it precludes any potential problems associated with transporting samples to an offsite laboratory (e.g., sample packaging, waste incompatibility, fume generation).

If samples must be analyzed off site, samples should be packaged on site in accordance with DOT regulations (49 CFR) and shipped to the laboratory for analysis.

Staging

Although every attempt should be made to minimize drum handling, drums must sometimes be staged (i.e., moved in an organized manner to predesignated areas) to facilitate characterization and remedial action, and to protect

drums from potentially hazardous site conditions (e.g., movement of heavy equipment and high temperatures that might cause explosion, ignition, or pressure buildup). Staging involves a trade-off between the increased hazards associated with drum movement and the decreased hazards associated with the enhanced organization and accessibility of the waste materials.

The number of staging areas necessary depends on site-specific circumstances such as the scope of the operation, the accessibility of drums in their original positions, and the perceived hazards. Investigation usually involves little, if any, staging; remedial and emergency operations can involve extensive drum staging. The extent of staging must be determined individually for each site, and should always be kept to a minimum. Up to five separate areas have been used (see Figure 11-5):

- An *initial staging area* where drums can be (1) organized according to type, size, and suspected contents, and (2) stored prior to sampling.
- An *opening area* where drums are opened, sampled, and resealed. Locate this area a safe distance from the original waste disposal or storage site and from all staging areas to prevent a chain reaction in case of fire or explosion.
- During large-scale remedial or emergency tasks, a separate *sampling area* may be set up at some distance from the opening area to reduce the number of people present in the opening area, and to limit potential casualties in case of an explosion.
- A *second staging area*, also known as a holding area, where drums are temporarily stored after sampling pending characterization of their contents. Do *not* place unsealed drums with unknown contents in the second staging area in case they contain incompatible materials. (Either remove the contents or overpack the drum.)
- A *final staging area*, also known as a bulking area, where substances that have been characterized are bulked for transport to treatment or disposal facilities.

  Locate the final staging area as close as possible to the site's exit.

  Grade the area and cover it with plastic sheeting.

  Construct approximately 1-foot-high (0.3-m-high) dikes around the entire area.

  Segregate drums according to their basic chemical categories (acids, heavy metals, pesticides, etc.) as determined by characterization. Construct separate areas for each type of waste present to preclude the possibility of intermingling incompatible chemicals when bulking.

In all staging areas, stage the drums two wide in two rows per area (see Figure 11-6), and space these rows 7 to 8 feet (2 to 2.5 m) apart to enable movement of the drum handling equipment.

Bulking

Wastes that have been characterized are often mixed together and placed in bulk containers such as tanks or vacuum trucks for shipment to treatment or disposal facilities. This increases the efficiency of transportation. Bulking should be performed only after thorough waste characterization by trained and experienced personnel. The preliminary tests described earlier under *Characterization* provide only a general indication of the nature of the individual wastes. In most cases, additional sampling and analysis to further characterize the wastes, and compatibility tests (in which small quantities of different wastes are mixed together under controlled conditions and observed for signs of incompatibility such as vapor generation and heat of reaction) should be conducted. Bulking is performed at the final staging area using the following procedures:

Crushed drums awaiting landfill. Note the staging of drums on the left in a row two drums wide.

- Inspect each tank trailer and remove any residual materials from the trailer prior to transferring any bulked materials. This will prevent reactions between incompatible chemicals.
- To move hazardous liquids, use pumps that are properly rated (see National Fire Protection Association [NFPA] 70 Articles 500-503 and NFPA 497M) and that have a safety relief valve with a splash shield. Make sure the pump hoses, casings, fittings, and gaskets are compatible with the material being pumped.
- Inspect hose lines before beginning work to ensure that all lines, fittings, and valves are intact with no weak spots.
- Take special precautions when handling hoses as they often contain residual material that can splash or spill on the personnel operating the hoses. Protect personnel against accidental splashing. Protect lines from vehicular and pedestrian traffic.
- Store flammable liquids in approved containers.

Shipment

Shipment of materials to offsite treatment, storage, or disposal facilities involves the entry of waste hauling vehicles into the site. U.S. Department of Transportation (DOT) regulations (49 CFR Parts 171-178) and EPA regulations (40 CFR Part 263) for shipment of hazardous

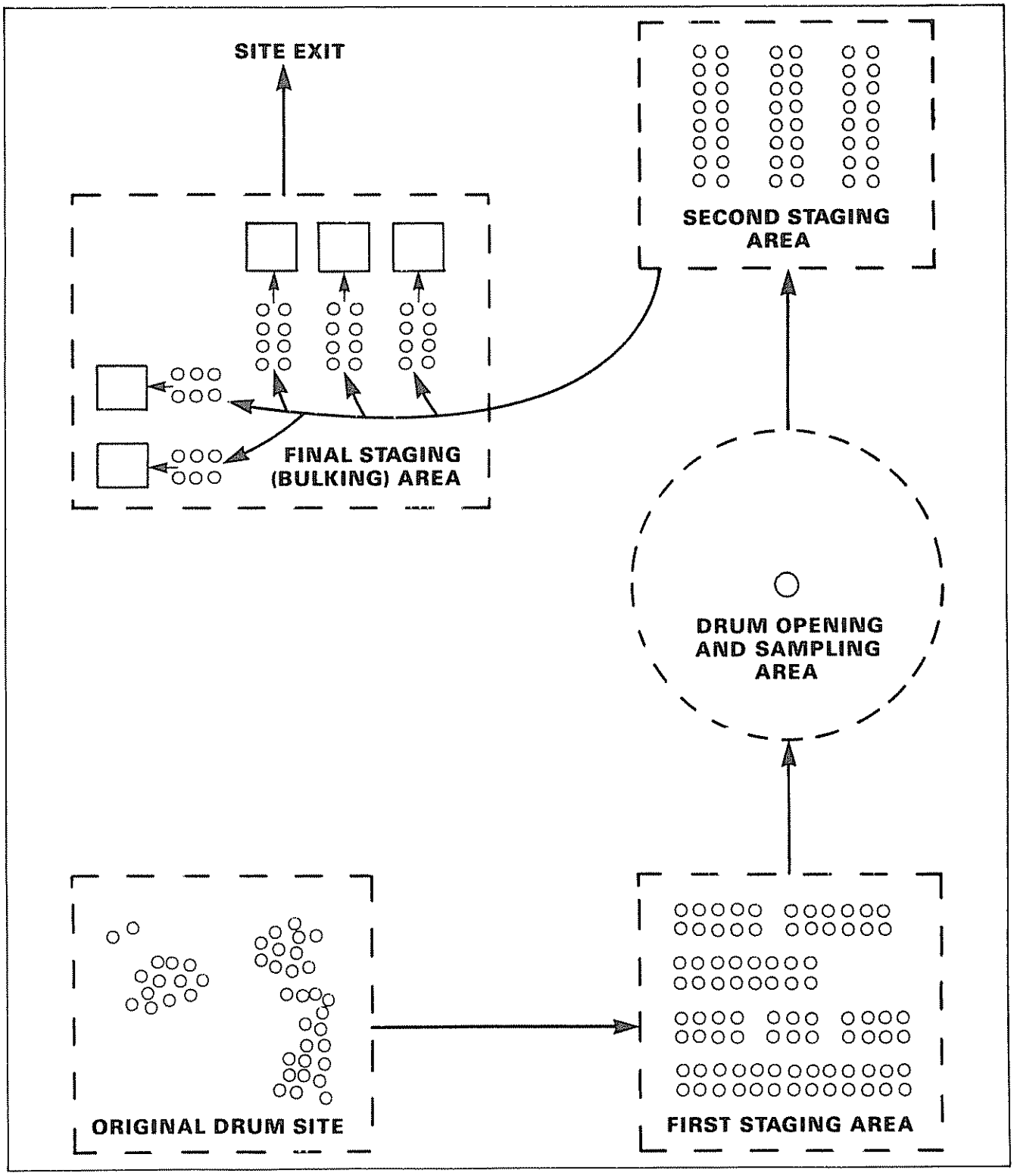


Figure 11-5. Possible Staging Areas at a Hazardous Waste Site

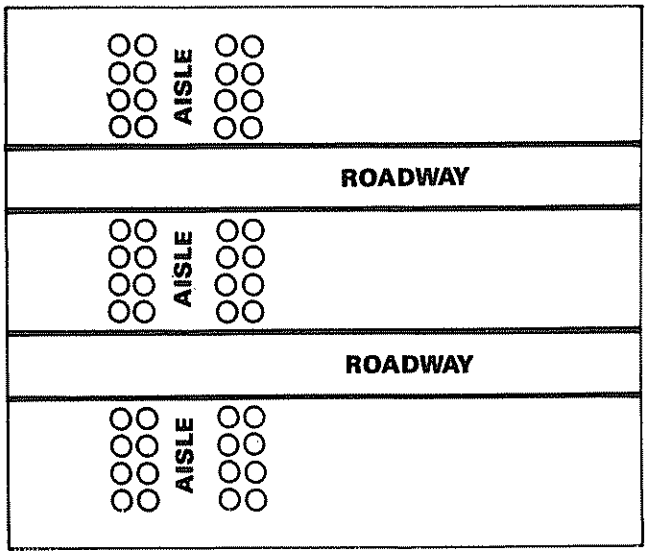
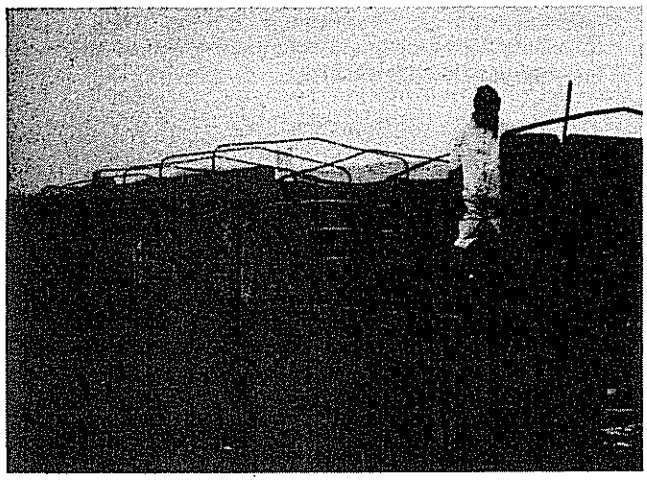


Figure 11-6. Sample Drum Staging Layout.
Source: Reference [1].



Single-stacked overpack drums awaiting transport off site. Worker suited in Level C personal protective equipment will spread a tarp over the drums to protect them during transport.

wastes must be complied with. The following guidelines can enhance the safety of these operations:

- Locate the final staging (bulking) area as close as possible to the site exit.
- Prepare a circulation plan that minimizes conflict between cleanup teams and waste haulers. Install traffic signs, lights, and other control devices as necessary.
- Provide adequate area for onsite and hauling vehicles to turn around. Where necessary, build or improve onsite roads.
- Stage hauling vehicles in a safe area until ready for loading with drivers remaining in cab. Minimize the time that drivers spend in hazardous areas.
- Outfit the driver with appropriate protective equipment.
- If drums are shipped, tightly seal the drums prior to loading. Overpack leaking or deteriorated drums prior to shipment. (Under most circumstances, overpack drums used for hazardous wastes may not be reused [49 CFR Part 173.3(c)]). Make sure that truck bed and walls are clean and smooth to prevent damage to drums. Do *not* double stack drums. Secure drums to prevent shifting during transport.
- Keep bulk solids several inches below the top of the truck container. Cover loads with a layer of clean soil, foam, and/or tarp. Secure the load to prevent shifting or release during transport.
- Weigh vehicles periodically to ensure that vehicle and road weight limits are not exceeded.
- Decontaminate vehicle tires prior to leaving the site to ensure that contamination is not carried onto public roads.
- Check periodically to ensure that vehicles are not releasing dust or vapor emissions off site.
- Develop procedures for responding quickly to offsite vehicle breakdown and accidents to ensure minimal public impact.

Special Case Problems

Tanks and Vaults

For tanks and vaults, which are often found on hazardous waste sites, the following procedures are recommended:

- In general, when opening a tank or vault follow the same procedures as for a sealed drum. If necessary, vent excess pressure if volatile substances are stored. Place deflecting shields between workers and the opening to prevent direct contamination of workers by materials forced out by pressure when the tank is opened.
- Guard manholes or access portals to prevent personnel from falling into the tank.
- Identify the contents through sampling and analysis. If characterization indicates that the contents can be safely moved with the available equipment, vacuum them into a trailer for transportation to a disposal or recycling facility.
- Empty and decontaminate the tank or vault before disposal.
- If it is necessary to enter a tank or vault (i.e., confined spaces) for any reason (e.g., to clean off solid materials or sludges on the bottom or sides of the tank or vault), the following precautions should be taken [4]:

  Ventilate thoroughly prior to entry.

  Disconnect connecting pipelines.

  Prior to entry, take air samples to prove the absence of flammable or other hazardous vapors and to demonstrate that adequate levels of oxygen exist.

Equip the entry team with appropriate respiratory protection, protective clothing, safety harnesses, and ropes.

Equip a safety observer with appropriate respiratory protection, protective clothing, a safety harness, and rope.

Establish lifeline signals prior to entry so that the worker and safety observer can communicate by tugs on the rope.

Have an additional person available in the immediate vicinity to assist the safety observer if needed.

Instruct the safety observer not to enter the space until additional personnel are on scene.

Vacuum Trucks

- Wear appropriate protective clothing and equipment when opening the hatch.
- If possible, use mobile steps or suitable scaffolding consistent with 29 CFR Part 1910, Subpart D. Avoid climbing up the ladder and walking across the tank catwalk.
- If the truck must be climbed, raise and lower equipment and samples in carriers to enable workers to use two hands while climbing.
- If possible, sample from the top of the vehicle. If it is necessary to sample from the drain spigot, take steps to prevent spraying of excessive substances. Have all personnel stand off to the side. Have sorbent materials on hand in the event of a spill.

Elevated Tanks

In general, observe the safety precautions described for vacuum trucks. In addition:

- Use a safety line and harness.
- Maintain ladders and railings in accordance with OSHA requirements (29 CFR Part 1910, Subpart D).

Compressed Gas Cylinders

- Obtain expert assistance in moving and disposing of compressed gas cylinders.
- Handle compressed gas cylinders with extreme caution. The rupture of a cylinder may result in an explosion, and the cylinder may become a dangerous projectile.
- Record the identification numbers on the cylinders to aid in characterizing their contents.

Ponds and Lagoons

- Drowning is a very real danger for personnel suited in protective equipment because the weight of protective equipment increases an individual's overall density and severely impairs their swimming ability. Where there is danger of drowning, provide necessary safety gear such as lifeboats, tag lines, railings, nets, safety harnesses, and flotation gear.
- Wherever possible, stay on shore. Avoid going out over the water.
- Be aware that some solid wastes may float and give the appearance of solid cracked mud. Caution should be exercised when working along shorelines.

References

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3. U.S. EPA. 1984. Characterization of Hazardous Waste Sites—A Methods Manual: Volume II. Available Sampling Methods. Second edition. EPA 600/4-84-076.

4. NIOSH. 1979. Criteria for a Recommended Standard: Working in Confined Spaces. NIOSH No. 80-106. Also available from U.S. Government Printing Office (#017-033-00353-0) and National Technical Information Service (PB-80-183015).