

# Department of Environment and Conservation Pollution Prevention Division

## **GUIDANCE DOCUMENT**

Title: Guidelines for Drum-Based Petroleum Products Storage At

**Non-Remote Sites** 

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**Approved By:** 

**Derrick Maddocks, Director** 

Petroleum Products Stored in Drums (Non-Remote) GD-PPD-072.2

#### 1.0 SUBJECT:

The storage of petroleum products stored in drums for shipment to remote sites.

This document does not address the storage of used oil in drums. Storage of used oil in drums is addressed in Subsection 21(2) of the *Used Oil Control Regulations*.

This document does not address storage of petroleum products in drums at remote sites (see GD-PPD-070.2).

#### 2.0 OBJECTIVES:

- To define situations where storage of petroleum products in drums for shipment to remote sites is acceptable.
- To define requirements which provide acceptable environmental protection when petroleum products are stored in drums.

#### 3.0 LEGISLATION:

- Environmental Protection Act
- Storage and Handling of Gasoline and Associated Products Regulations, 2003

#### 4.0 **DEFINITIONS**:

Certificate of Approval: an approval as defined in section 7.0 of this document

Drums: nominal 205 litre/55 U.S. gallon metal or plastic containers for storage of

petroleum products, and includes similarly sized drums or containers designed for storage of petroleum products. Containers must have the

capability to be closed

ENVC: Department of Environment and Conservation

Factory Pre-Filled Drums means drums which have been filled by the product manufacturer, usually at

a refinery or bulk storage facility, for the purpose of supplying pre-packaged,

product

Registered: registered under Section 13 of the Storage and Handling of Gasoline and

Associated Products Regulations, 2003

SNL: Service Newfoundland and Labrador

### 5.0 PRINCIPLE:

Petroleum products shall be stored in registered tanks meeting the requirements of the applicable construction and installation code. These tanks shall be secondarily contained.

Where ENVC or SNL on behalf of ENVC has determined that the use of a tank is not practical, or the nature of the business is such that it supplies petroleum products in drums for remote operations, petroleum storage in factory pre-filled drums may be accepted where the requirements in Section 6.0 are met.

This means that drum storage for further shipment to a remote site that is approved as per GD-PPD-070.2 may be approved subject to the requirements in Sections 6.0 and 7.0.

Since transferring petroleum products increases the risk of spills, ENVC and SNL will accept only factory pre-filled drums, shipped directly from the product manufacturer. Storage drums cannot be refilled on site from another source, such as a fuel delivery truck or tank.

#### 6.0 REQUIREMENTS FOR PETROLEUM STORAGE IN DRUMS:

The proponent is required to submit an application (see Application For The Establishment Of Fuel Caches At Remote Sites) with the required information:

- Submission of application at least 30 days in advance
- Proponent's name and contact information
- Location on a topographic map: demonstrate that the location is environmentally protective, i.e. on level terrain, away from water bodies, protected by a suitable secondary containment system (provide details)
- A secondary containment system is required. The secondary containment system must be nonpermeable, meet engineering standards (either geosynthetic or engineered natural material), and must have sufficient capacity to contain a minimum of 110% of the total volume of product stored
- The secondary containment system must have a means to drain water / precipitation and should be protected from the weather
- Duration of storage, estimated start and end dates
- Number of drums and product being stored
- Supplier of petroleum products, base of operation of supplier and contact information
- Method of transportation to and from storage site, transporter's name and contact information
- Final destination of empty drums. Regular removal is required. Reuse, or return to supplier is preferred
- Return of drums from clients for reuse or return to supplier for proper disposal must be accepted
- Location of drums in relation to sources of ignition or other human activities
- Contingency Plan
- Security Plan
- Operational Plan (how drums will be handled, how damaged drums will be managed, how site will be decommissioned, etc.)
- Inventory Control Plan (see Fuel Cache Inventory for an acceptable format)
- Surety bond (\$10,000 up to 100 drums, \$20,000 greater than 100 drums)
- Copy of approval for storage from municipal authority when located within municipal boundaries
- The maximum number of drums permitted to be stored at the approved storage site will be 200 full drums plus 100 empty drums.

#### 7.0 OTHER:

Any leak or spill of gasoline or associated product shall be reported immediately to SNL by calling the Canadian Coast Guard Environmental Emergency line at 772-2083 or 1-800-563-9089. Any resulting cleanup shall be conducted per ENVC legislation, regulations, policies and procedures.

Where the proponent has provided sufficient and acceptable information as per Section 6.0, and storage is for 5 or more drums, SNL will issue a Certificate of Approval for the proposed drum-based petroleum storage. Where less than 5 drums are to be stored, notification by the proponent with the information in Section 6.0 is sufficient, no Certificate of Approval will be issued and no Surety bond will be required.

All drums shall be permanently labelled indicating contents and the owner's name.