GPP 26: Safe storage of Drums and Intermediate Bulk Containers (IBCs)

These guidelines are produced by Natural Resources Wales, the Northern Ireland Environment Agency, the Scottish Environment Protection Agency. Contact details are available at the end of this document.

Guidance for Pollution Prevention (GPPs) are based on relevant legislation and reflect current good practice. Following these notes will help you manage your environmental responsibilities to prevent pollution and comply with the law. If you cause pollution or allow it to occur, you may be committing a criminal offence.

For Northern Ireland, Scotland and Wales, this document provides guidance on environmental legislation. These guidelines are not endorsed by the Environment Agency. For guidance on environmental regulations in England, go to www.gov.uk.

To find the relevant regulations visit www.legislation.gov.uk

1. Introduction

These guidelines will help you if you’re responsible for storing and handling drums and Intermediate Bulk Containers (IBCs). They’re written for site operators of industrial and commercial premises.

Please note: This GPP has not yet been reviewed for WALES. It provides good practice advice, but should not be used as regulatory guidance by users in Wales. We aim to have this updated as soon as possible.

Following the guidance will help you reduce the risk of pollution from your site to land, surface waters and groundwater.

What is covered

The guidelines give information and advice about storing liquids, for example oil and chemicals, in:

- small containers
- drums, up to 205 litres
- IBCs up to 1000 litres

This guidance applies only where these containers aren’t directly connected any part of a manufacturing system, either as an input or output. This guidance also applies to
containers that are slightly different sizes from those mentioned, and it applies to any number of containers.

These guidelines refer to environmental legislation you ‘must’ follow in Northern Ireland, Scotland and Wales, including details for oil storage. Where the recommendations aren’t a legal requirement, they are written as things you “should” do.

Legal requirements relating to oil storage are highlighted in yellow

If you require further information contact your environmental regulator. Contact details are at the end of this document.

The guidance doesn't cover:

- containers above 1000 litres
- bulk storage in fixed tanks or mobile bowsers
- underground oil or chemical storage
- fire prevention and control
- air quality, although following the guidelines will help to protect air quality
- dangerous substances stored under Control of Major Accident Hazards (COMAH) Regulations
- regulations about transporting goods
- health and safety requirements, for example labelling and confined spaces.

Guidance for these activities is available in references 2, 3, 4 and 5 and from the Health and Safety Executive (HSE) and HSENI, Fire and Rescue Services (FRS) and your local council.
# Table of Contents

1. Introduction ........................................................................................................................................... 1

2. Safe drum and IBC storage key points ................................................................................................. 4

3. Why use this guideline .......................................................................................................................... 4

3.1 What are the problems? ....................................................................................................................... 5

3.2 How a spill can escape from your site ................................................................................................. 5

4. Storage basics ........................................................................................................................................ 5

5. Safe storage .......................................................................................................................................... 6

5.1. Primary container ............................................................................................................................... 6

5.2 Secondary containment systems ......................................................................................................... 7

5.2.1 Secondary containment options include: ....................................................................................... 7

5.2.2 Where is the best place to put your secondary containment and storage? ................................. 10

5.2.3 How big does your containment need to be? .............................................................................. 11

5.2.4 What should secondary containment systems be made from? ................................................. 11

5.2.5 What else do you need to think about? ......................................................................................... 12

5.3 Special storage requirements (COMAH, COSHH, Pesticides and flammables) ............................... 13

5.3.1 Substances hazardous to health .................................................................................................... 13

5.3.2 Flammable liquids ......................................................................................................................... 13

5.3.3 Pesticides ...................................................................................................................................... 13

5.3.4 Timber treatments ......................................................................................................................... 14

5.3.5 Solvent storage ................................................................................................................................ 14

5.3.6 Oil Storage ................................................................................................................................... 14

5.3.7 Adblue ........................................................................................................................................ 14

6. Delivery and handling ............................................................................................................................ 15

7. Inspection and maintenance .................................................................................................................... 15

8. Dealing with spills ................................................................................................................................. 16

8.1 Prevent spills ..................................................................................................................................... 16

8.2 Minimise environmental harm from spills ....................................................................................... 16

9. Waste management ............................................................................................................................... 18

9.1 Storing waste ..................................................................................................................................... 18

10: Glossary ............................................................................................................................................... 19

11 References .......................................................................................................................................... 20

12. Other useful sources of information ................................................................................................... 23
2. Safe drum and IBC storage key points

Know what you have in store

Label all your storage with what’s stored in it and any hazard it poses.
Keep an up to date inventory of the materials you have on site and what volumes

See section 4 COMPLETED

Safe storage

Make sure primary containers are fit for purpose.
Check the location, capacity, design and construction of secondary containment.
Take special care if storing hazardous substances, flammable liquids or pesticides – there may be additional precautions necessary.

See section 5 COMPLETED

Delivery and handling of containers

Label materials delivery and handling areas.
Isolate these areas from surface water and groundwater.
Supervise deliveries and transfers

See section 6 COMPLETED

Primary and secondary containment: Inspection and maintenance

Know what to look for when you check your storage.
Quick on site jobs.
Repair or take out of use.

See section 7 COMPLETED

Prepare how you will deal with a spill

Assess the risk.
Write a better pollution incident response plan.
Have the appropriate spill kit available

See section 8 COMPLETED

Waste management

Reduce the waste you produce
Comply with the Duty of Care
Make sure any waste is disposed of appropriately.

See section 9 COMPLETED
3. Why use this guideline

Businesses routinely store and move a variety of potentially polluting materials in containers, ranging in capacity from a few litres up to drums of 205 litres (45 gallon) and 1000 litre IBCs. You must store these materials in accordance with:

- appropriate legislation
- HSE requirements
- any other relevant guidelines such as those issued by the FRS.

3.1 What are the problems?

Containers of oil, chemicals or other potentially polluting materials can pollute surface water and groundwater. Pollution can be caused by spills from:

- incorrect storage and handling of containers
- accidental leaks
- vandalism
- overfilling or failure of storage structures
- run-off from fires and contaminated firewater
- incorrect or damaged drainage systems.

These are all potential hazards. There are many substances that aren’t harmful to humans but that will cause pollution if they’re spilt, for example liquid food and drinks, detergents and paper sludges.

3.2 How a spill can escape from your site

Pollutants can escape into the environment from your site, or where a spill happens off site, via different routes or pathways:

- through the surface water drainage system
- direct run-off into a watercourse
- through the soil or via soakaways, drains or damaged surfaces to groundwater
- through the foul sewer system, where pollutants:
  - may be discharged through storm overflows
  - could pass through the sewage treatment works
  - may reduce the performance of the works so it can’t treat sewage properly.

Good management practices will help to prevent pollution incidents. You need to make sure your staff and contractors use the management practices you have in place. If they understand the potential links between the hazard sources, pathways and receptors and how this can affect your business, they will understand why your processes are important.

4. Storage basics

To control the pollution risk from your site you need to know what and how much you’re storing and be able to identify it quickly. You should only store materials that you are allowed to.

We recommend you:
• clearly label individual containers with details of what they contain and any hazard they pose
• label storage areas with details of what can be stored in them
• fit warning signs, for example appropriate hazardous substances symbols (pictograms), at access points to dedicated stores
• store different materials separately so they can’t mix if there’s a leak (it’s easier to deal with a spill of just one material than a mixture); this may be a legal requirement for some substances – see information from the HSE in Reference 6
• only keep the minimum working quantity of materials on site
• protect storage from extremes in weather whenever possible, for example sunlight, frost
• keep storage areas away, or isolated, from on site drainage, surface waters and groundwater and vehicle routes.

Make sure your product inventory is kept up-to-date and contains detailed information including:
• product types
• trade names
• UN numbers
• Control of Substances Hazardous to Health (COSHH) Regulations data
• volumes
• location on site or within the store.

There may be other legal requirements for your storage, for example health and safety requirements. It’s your responsibility to find out what applies to your storage and make sure you comply.

Other sections of this guidance cover:

• safe storage
• primary and secondary containment
• special storage requirements for liquids with hazardous properties
• delivery and maintenance procedures
• how to deal with a spill.

5. Safe storage

5.1. Primary container

Make sure your primary containers have sufficient strength and structural integrity so they don’t leak or burst under normal use. For example, rusty or dented containers are unlikely to be fit for use.

If your containers have a packaging certificate and are marked as complying with the United Nations (UN) inspection would normally be considered structurally sound. However they should still be examined before use in case they have been damaged since their last inspection.

Repair or remove any damaged or unsuitable containers as soon as they are identified.

GPP 26 July 2018
Unless legal requirements say otherwise, you should store primary containers inside a building, under cover or protected from the elements by another method. Steel drums stored outside in a vertical position are at risk of rusting from rainwater, while plastic containers can deteriorate over time and become brittle.

Don’t store drums directly on top of one another because this greatly increases the risk of drums splitting under pressure or falling over.

If you’re reusing containers, it’s your responsibility to make sure what it’s made from is suitable for the product you’re planning to put into it, and that it has a life expectancy suitable for your needs. You should also make sure that any residues from the previous contents are unlikely to contaminate or react with the new contents. See section 10: Waste Management, for information about how you can dispose of any residues legally and safely.

5.2 Secondary containment systems
It’s good practice to store all drums or IBCs on, or in, an impermeable secondary containment system. Secondary containment systems are designed to catch leaks or spills from the primary container while it is in use.

**Make sure all your drums and IBCs are stored in a suitable secondary containment system.** This will significantly reduce the risk of causing pollution. It will also allow you to recover or treat any spilled material, and will help to stop spilled product escaping. The secondary containment must not have any drainage.

5.2.1 Secondary containment options include:

### Drip Tray
- A simple tray under storage containers to collect minor leaks and spills
- For use with a single drum or a few small containers in storage or at point of use
- **If you store oil on a drip tray in drums, the tray must be able to contain at least 25% of the total drum volume.**

### Bunded dispensing station
- Designed to allow drums and IBCs to be stored safely and collect any drips or spills while in use
- Provide secondary containment volume but with extra space to allow small containers to be filled over the secondary containment
Dispensing sump trolley
- Proprietary system for transporting and then dispensing a single drum or small container.
- Not suitable for use with IBCs due to their weight when full.
- Good where products need to be stored next to their point of use.
- Fully bunded in upright position

Sump pallets
- Pallets to hold containers with a sump to contain spills
- Suitable for use with small containers, two, four or eight drums, or up to 4 IBCs
- Containers are kept off the ground and containment is provided

Decking
- Decking units allow containers of any size to stand off the ground on a grid with containment underneath.
- Can be added to cover the floor area required, either where in use or in a dedicated store.

Drum racking – indoor storage
- Racks for storing drums, either vertically or horizontally. They may have containment that allows you to dispense from the drums.
- Off the ground storage with integral bunding or can be used in dedicated stores.
- Drums stored horizontally would ideally be turned so both outlets are horizontal (i.e. at 3 and 9 o’clock) so less product will be lost if there is a leak.
Different manufacturers or suppliers will provide storage options that are made from different materials, look different and have additional or different features from the examples shown. The types of storage shown here give examples of what is available, they are not intended as an endorsement of any of these products.
5.2.2 Where is the best place to put your secondary containment and storage?

You should carefully consider where you put the store of each material you have on site.

The best option is to store your drums and IBCs indoors. This might not be possible due to health and safety concerns but storage indoors reduces the risk of vandalism. It prevents the build up of rainwater in the bund or drip trays which could become contaminated by any drips, leaks or spills. It will also reduce the risk from extremes of temperature that can affect the integrity of the storage containers.

We recommend that you don’t have storage areas or containers within 10 metres of surface water or 50 metres of a borehole, well or spring.

You should also consider how close your storage areas are to:

- surface water drains;
- sensitive groundwater areas, for example Source Protection Zones in Wales;
- flood plains, including high tidal water levels;
- designated vehicle movement areas;
- ignition sources;
- people who could be affected by odours, fire or spills, for example schools and houses;
- other storage areas that contain materials that would react with those in this storage area.

You can check if there are sensitive groundwater areas or Source Protection Zones near your site by checking your environmental regulator’s website or by contacting us. See Reference 7 for guidance about storing materials in sensitive groundwater areas.

You can check if your site is at risk of flooding by using the flood maps. See Reference 8 for links to flood maps for your area. If you have no option other than to store materials close to these areas, you may need more protection than the minimum levels of secondary containment described in this PPG.

You might, for example, need bollards to protect storage areas from vehicle traffic. You may also need to protect your storage and secondary containment from rising flood waters.

If you’re in any doubt about the type of secondary containment you need, or where it can be placed, ask your environmental regulator for advice. Contact details are at the end of this document.
5.2.3 How big does your containment need to be?
The amount of liquid your secondary containment facilities can hold should be based on the maximum volume of product you may be storing at any one time. If you have a fixed fire-fighting system you will need additional capacity for the quantity of fire-fighting media likely to be used.

<table>
<thead>
<tr>
<th>Container type</th>
<th>Minimum secondary containment volume</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single drum</td>
<td>Secondary containment for drum storage can be provided by a drip tray with at least 25% of the volume of the drum.</td>
</tr>
<tr>
<td>Multiple drums</td>
<td>Secondary containment for drum storage can be provided by a drip tray with at least 25% of the total volume of the drums stored.</td>
</tr>
<tr>
<td>Single IBC</td>
<td>Secondary containment with at least 110% of the container volume. (You can’t use a drip tray with just 25% of the volume if you store oil in an IBC)</td>
</tr>
<tr>
<td>Multiple IBCs</td>
<td>Secondary containment with either a minimum of 25% of the total volume stored, or 110% of the volume of the largest container, whichever is the greater.</td>
</tr>
</tbody>
</table>

Where containers are stored inside a building, you should make sure that the secondary containment takes into account the risk from the materials stored. For example, agrochemicals such as pesticides should have extra capacity in the secondary containment; preferably between 110% and 185% of the maximum storage capacity. See section 5.3 for more information.

With large external stores, 25% containment capacity may result in low containment walls, which are quickly overwhelmed by rainfall or fire-fighting agents. We recommend an additional 100 mm height on the walls to account for this.

5.2.4 What should secondary containment systems be made from?
You can use secondary containment systems that are prefabricated from:

- steel,
- plastic
- fibre glass
- concrete or masonry with suitable lining to make sure it’s impermeable
- kerbs, ramps or sloped floors.

The type of system you use must be able to contain the liquids you store and should be suitable for the needs of your site. All containment walls and floors must be impermeable and resistant to attack from the materials stored. Make sure the system you put in is designed for long term storage, not just for temporary or emergency storage. There can be no drainage outlet from your secondary containment.
Masonry and some constructed concrete structures aren’t impermeable unless they’re treated with a product designed to resist the materials you plan to store. Concrete and masonry bunds shouldn’t have a damp-proof course.

Floor joints should be avoided but, if they’re required for constructional purposes, take great care that the joint sealing results in a complete and lasting liquid-proof seal and is resistant to heat, for example during a fire. Sealants must be able to withstand attack from any material likely to be stored.

A sloping floor together with a sump cast in the base slab will ease the recovery of spilled product and any accumulated rainwater. Ensure that gradients are within the safe working limits recommended by the manufacturer for any forklift trucks used.

5.2.5 What else do you need to think about?
The secondary containment you choose has to work for you and your processes. When you’re designing your storage you should take account of other aspects.

Containment:
- site environmental sensitivity, including underlying groundwater;
- nature of the product, e.g. toxicity, persistence;
- impermeability and resistance to attack from materials stored;
- fixed fire-fighting systems and fire water containment;
- fire resistance, including the effects of fire on the containment system;
- effect of extremes in weather, freezing or high temperatures.

Safety:
- signage;
- ventilation at high and low level (above secondary containment);
- manual handling;
- the need to segregate products, especially if they are incompatible and would react if mixed.

Fire prevention and control:
- separation from ignition sources, process areas, occupied buildings and site boundaries;
- distance between stores, to stop fire spreading, consult your local FRS for advice;
- fire detection systems;
- water supply for fire fighting;
- access for fire fighting vehicles and personnel;
- discuss fire fighting options with your local FRS.

Security:
- protection from vandalism, unauthorised use and arson.
Relevant legislation

- for example if storing certain hazardous substances (see section 5.3)

Services such as electricity supply should be carried over the secondary containment system rather than penetrating it. Mains water supply (except water-based fixed fire-fighting systems and safety shower/eye wash stations) shouldn’t enter the containment area of the store. **Make sure there is no drainage discharge from the secondary containment.**

External walls next to any racked storage should be strong enough to withstand the force of the rack, or its contents, falling against them. In clad buildings where racking extends above any containment system, provision should be made to prevent a high level leak running down between the cladding and the containment wall. Containers shouldn’t be stored at such a height or so close to the walls that they might fall outside the containment system or that liquid ‘jetting’ from a leak would reach over the wall.

### 5.3 Special storage requirements (COMAH, COSHH, Pesticides and flammables)

If the quantity of hazardous substances you store exceeds the thresholds set in the Control of Major Accident Hazards (COMAH) Regulations, the requirements of those regulations will supersede this guidance. You can find guidance on the requirements of these regulations on the HSE website. This will also give information on the separation distances to minimise risk from fire and reactions. See Reference 9: COMAH

Because of the risks associated with particular materials you may need additional pollution prevention measures such as:

#### 5.3.1 Substances hazardous to health

When drums and IBCs are being handled, particularly during dispensing, there’s the potential for minor leaks, emissions or spills. Under the Control of Substances Hazardous to Heath (COSHH) Regulations, employers are required to carry out a risk assessment and to identify the steps needed to reduce any identified risk to their employees’ health.

You can find information from the HSE on the requirements of COSHH in Reference 10

#### 5.3.2 Flammable liquids

A flammable liquid is defined as a liquid with a flashpoint of 60°C or below. If you store and use flammable liquids (including highly flammable liquids and petroleum products) you must comply with health and safety legislation.

You can find information from the HSE on the storage of flammable liquids in containers in Reference 6

You can find information from the HSE on the safe use, handling and dispensing of flammable liquids in Reference 6

#### 5.3.3 Pesticides

You can only have or store pesticides that have been approved for use in the UK and for which the approval is still valid. The HSE provide a guidance note on pesticide storage for farmers and other professional users. See Reference 11

If you store more than 200 litres (200 kg) of pesticides for sale or supply, you must follow the statutory guidance in the ‘Yellow code of practice’, reference 11, and have the necessary store keeper training and certification.
The store and its management arrangements must be supervised by someone holding a certificate of competence and it must be inspected annually, as a minimum, by an independent expert. A store registration scheme is operated by BASIS (Registration) Limited. See useful websites.

If you’re storing pesticides for professional uses, for example

- farming
- horticulture
- forestry
- amenity area use
- industrial land and sports grounds

you must follow the statutory guidance in the codes of practice for plant protection products, Reference 11.

Further guidance on pesticide storage is available in Section 12, other useful sources of information.

5.3.4 Timber treatments
Timber treatments are classed as pesticides so are subject to the same requirements. See References 11 and 12.

5.3.5 Solvent storage
Make sure that any organic, and particularly chlorinated, solvents are stored safely. Even a small spill of these materials can seriously pollute groundwater making it unusable for drinking water supply and toxic to aquatic life. Groundwater is an important source of public and private drinking water which, once contaminated, is very difficult and expensive to clean up.

You should store all solvents according to the guidelines in Reference 2, making sure you have appropriate secondary containment and regularly check your storage for needed maintenance and leaks.

5.3.6 Oil Storage
If you are storing oil (or fuels) in drums or IBCs, you must comply with the relevant regulations on oil storage. The legal requirements are highlighted in yellow throughout this document. You can find more information on oil storage in Reference 2 and 5, and in the useful websites.

5.3.7 Adblue
Adblue contains urea and ammonia. Ammonia is corrosive to metals so can damage tanks and pipework. It is important that solutions such as Adblue are stored in containers that are designed and manufactured from materials that are suitable for use with urea. The same applies to all storage ancillary equipment, such as valves, dispensing nozzles and pipework.

- Use containers that are designed for use with Adblue
- Isolate your storage from surface water drains (note that oil separators will not remove Adblue)
- Have secondary containment e.g. bunds or drip trays
- Use a dispensing nozzle with an automatic shutoff that can’t be left open.

See Section 12: Useful sources of information for the industry guide to storage and use of AdBlue
6. Delivery and handling

Many pollution incidents involving drums and IBCs happen during the delivery and handling of containers, for example forklift damage or spills.

You should designate and clearly mark delivery, handling and transfer or decanting areas. Make sure the area is impermeable and isolated from the surface water drainage system, possibly with the use of ramps, sumps or drainage shut-off valves. This will minimise the risk of your storage causing pollution if an accident happens.

If you’re unable to isolate the area from surface water drains, consider placing reusable drain covers over the drains during every delivery to prevent pollution if there is an accident. Think about putting a roof or canopy over the area to simplify the management of surface water in these areas. In Scotland you must not allow any runoff from oil or chemical storage, handling or delivery areas to enter the surface water drainage system from facilities constructed after 1 April 2007.

Make sure everyone knows the correct procedures for these activities. Make someone responsible for supervising all deliveries and transfer processes. They should know where spill kits are kept and they should know how to use them. See section 8.

Only allow forklift trucks to be used by trained operators and supervise deliveries (loading and unloading). Any damaged containers or spills should be reported immediately for action (see Sections 7 and 8). Use drum carriers, drum taps, funnels and containers with lids to minimise the risk of spillage during handling and transfer.

Unless you are decanting into a container with a wide neck, use a funnel to reduce the chance of material spilling. The funnel should be stored within the secondary containment, or in a secure area, when it’s not in use so drips can’t cause pollution. Make sure all taps are closed after the transfer of materials is completed and that there are no leaks from valves or seals.

7. Inspection and maintenance

Drums and IBCs will last longer if they’re protected from direct sunlight and rainfall, both of which can degrade the primary container and secondary containment.

You should inspect your primary containers and secondary containment facilities regularly, and check them at least weekly, unless the material you’re storing means you need to inspect it more frequently. You should make sure that:

- they aren’t damaged or leaking, for example no corrosion, deformities, cracks or stains from the material stored;
- rainwater that has collected in the bund or drip tray has been removed
- the bund or drip tray is clean and clear of product and debris;
- product label signs and hazard information are undamaged;
- maximum storage volumes and stack heights haven’t been exceeded and products are stored in the correct area;
- all taps not in use are closed and any pipework attached to the container is completely inside the secondary containment.
In extremes of weather conditions, for example prolonged hot weather, heavy rainfall or freezing temperatures, you may need to make inspections more frequently.

Check the secondary containment. If it has accumulated liquid, such as rainwater, you should check that it is uncontaminated and not the result of a leak. Contained water shows that the secondary containment is intact, however it will also reduce the capacity of the containment. Any liquid should be pumped or bailed out in a controlled way. If it is contaminated it may need to be disposed of as hazardous/special waste. See section 10

Any defects or damage to the container or the secondary containment should be repaired as soon as possible. Make sure that the repairs are done in a way that ensures the container or secondary containment remain impermeable to the product being stored.

If it can’t be repaired then the container or containment system should be taken out of use immediately.

Keep a record of inspections, cleaning and maintenance.

8. Dealing with spills

8.1 Prevent spills
Assess the risks on your site and put in place procedures to prevent them. Following the guidance in sections 4-8 of this document will help you to minimize the risk of spills. Safe, secure storage, careful deliveries and transfers as well as good training for staff are essential for preventing pollution.

References 13 and 14 have guidance on containment, emergency planning and incident response.

8.2 Minimise environmental harm from spills
Have a drainage plan
You should draw up a detailed site drainage plan, this will help you prevent pollution in the event of a spill or a fire. This should be part of your site’s pollution incident response plan (PIRP). Reference 13: GPP 22 provides guidance on developing a PIRP as well as providing a template to follow.

Train staff
Staff training is important in preventing pollution; this could be from a spill or from a fire. Training should include when and how to use a spill kit and the appropriate PPE for the materials stored on site.

Spill kits
A spill kit should contain products that are suitable for dealing with the products that you have on site and the products that you transport. It should contain:

- Leak sealing putty
- Over drums
- Drain seals
- Oil/chemical sorbents
- PPE
You should have spill kits situated close to storage areas where they may be needed, and well away from these areas in case of a major spill or fire that prevents access.

Make sure staff are trained in the use of the spill kits, and if they are used to contain a spill on site, make sure the products are replaced for the next time they are needed.

If you have a spill and aren’t sure what to do, or if you can’t take action to stop it reaching the environment, call us on our hotline, 0800 80 70 60.

To contain leaks or spills:

- **Have a ‘quarantine area’** where leaking containers can be placed safely.

- **Have a leak-sealing kit** available at delivery and handling areas, or other high-risk locations, to temporarily seal leaking containers until they can be put somewhere safe or taken out of use. You may be able to use temporary secondary containment, for example for small portable containers or portable tanks.

- **Carry a spill kit** on all vehicles transporting drums and IBCs, with PPE, appropriate to the goods being transported. Depending on what you’re transporting, this may be a legal requirement. In some circumstances, this may mean a vehicle should have a dual purpose spill kit for the material being carried, the fuel tank and any fuel additives.

- **If you’re storing large numbers of drums or IBCs ask your local FRS for advice** about distance between storage sections, road widths and fire prevention.

- **Never wash away spilt material** or use detergents or dispersants unless you’ve planned for this, know your drainage system can contain the spill, have consulted your environmental regulator and included it in your pollution incident response plan.

Contain any spillage following the pollution control hierarchy in Reference 14 - GPP 22: Dealing with spills. In high-risk areas, consider the use of cut-off or isolation valves in the drainage system.

All contained spills and sorbents or pollution control equipment used to control the spill should be stored safely until they can be disposed of. Contaminated sorbents or equipment may need to be disposed of as hazardous/special waste. See section 10.
9. Waste management

If you produce, import or arrange for waste to be disposed of, you have a legal responsibility to make sure it's stored, transported, kept, treated and/or disposed of without harming the environment. This is called your Duty of Care. See reference 15: Duty of Care for Waste

There are additional requirements if you produce hazardous waste (special waste in Scotland) for example waste oils, acids and solvents. This also applies to materials used to contain and clean up spills, such as sorbents, booms and drain blockers. You might also have to treat any other objects contaminated with oils, acids, solvents or other stored materials as hazardous/special waste.

You must keep hazardous/special waste segregated from other business wastes. Do not mix different types of hazardous/special waste.

You must keep different categories of waste separate unless you have a permit that specifically allows you to mix them. You can't move hazardous or special waste without a consignment note. If you have to move hazardous or special waste in an emergency, you must take steps to minimise the risk to the public or to the environment and contact your environmental regulator as soon as possible.

9.1 Storing waste

Waste containers must always be clearly labelled with their contents. You should store all waste and waste containers in designated areas which are isolated from surface water drains or direct discharge to the environment.

Your waste must be stored securely; all reasonable steps must be taken to ensure that waste cannot escape and members of the public are unable to gain access to it.

The area where waste is collected and stored should be able to safely contain any spill or leak. Empty containers shouldn't be allowed to accumulate, but should be collected by your supplier (where possible), dealt with using suitable on-site facilities or removed as soon as possible by a registered waste carrier to a permitted or licensed facility.

It's a good idea to remove wastes often enough so they don't cause odour, pest or vermin problems and to reduce the risk of fire. For further information on the storage and disposal of waste oils. See reference 16 - GPP 8: Safe storage and disposal of waste oils.

In Scotland and Northern Ireland, if you store waste temporarily on your site, you must meet the requirements of a Paragraph 41 exemption from Waste Management Licensing.

The exemption doesn't have a limit on the volume of non hazardous waste you can store. But if you store hazardous/special waste in Scotland or Northern Ireland, there are specified maximum total volume limits for different cases and you mustn't store it for longer than 12 months. If you exceed these limits you will require a waste management licence. You don't have to register the exemption with your environmental regulator.
| **Environmentally sensitive area** | Examples include: Site of Special Scientific Interest (SSSI), Area of Special Scientific Interest (ASSI), Special Area of Conservation (SAC), Special Protection Area (SPA), National Nature Reserve (NNR), Sites of international conservation importance – Ramsar sites, areas of Outstanding Natural Beauty (AONBs), National Scenic Areas (NASs). |
| **Fixed fire fighting system** | Fire fighting apparatus installed at a site, not fire extinguishers placed around a site. Designed specifically for a site and the materials present to make sure a fire is put out quickly and effectively. Fire fighting agent is chosen for the product and equipment on the site. |
| **Groundwater** | Water below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil. The saturation zone is where all the cracks in the rock and all the spaces between the grains of rock and within the soil are filled with water, these are known as aquifers. |
| **Hazardous waste Special waste in Scotland** | Wastes, specified in the European Waste Catalogue, which may be harmful to human health or the environment. This includes, but isn’t limited to:  
  - Paint (oil and solvent based)  
  - Oil and oily sludges, e.g. engine oil  
  - Other chemical wastes such as disinfectants, solvents, insecticides and pesticides  
  - Garage waste such as used oil filters or fuel filters, aerosols, antifreeze and brake fluid, lead acid batteries, contaminated rags |
| **Primary container** | The container the material is stored in, for example a tank, intermediate bulk container or drum. It’s the first line of defence and must be fit for purpose. |
| **Secondary containment** | This is a bund, or a drip tray. Secondary containment systems must be maintained and be big enough to contain a spill from the associated container/s. |
| **Spill kit** | This is a collection of pollution control equipment held in one place and specific to the materials you have on site. Proprietary oil and/or chemical spill kits are available; check with your pollution control equipment supplier that the contents are suitable for your needs before buying these.  
We recommend storing a spill kit near to where it may be needed, for example next to storage containers or delivery areas, and in an alternative location in case it isn’t safe to reach some of the spill kits during an incident. |
| **Surface water** | This includes rivers, streams, canals, burns, ditches (including ones that are temporarily dry), lakes, lochs, loughs, reservoirs, ponds, estuaries and coastal waters, up to three miles offshore |
11 References

Reference 1
HSE: Chemical storage and delivery
HSE: Chemical warehousing – the storage of packaged dangerous substances
HSE: Storage of flammable liquids in containers

Reference 2
Regulations for Oil storage:
In Northern Ireland: DAERA: Oil Storage https://www.daera-ni.gov.uk/articles/oil-storage

Reference 3
Fire and rescue services:
Northern Ireland: https://www.nifrs.org/
Scotland: http://www.firescotland.gov.uk/
Wales: https://gov.wales/topics/people-and-communities/communities/safety/fire/localservices/?lang=en
Contact your local council https://www.gov.uk/find-local-council

Reference 4
Transporting dangerous goods
GOV.UK: https://www.gov.uk/guidance/moving-dangerous-goods

Reference 5
HSE COMAH CA Procedures and Delivery guidance http://www.hse.gov.uk/comah/ca-guides.htm
Reference 6
Flammable liquids

Reference 7
Groundwater protection:
For Northern Ireland, Groundwater:  https://www.daera-ni.gov.uk/articles/groundwater#toc-4

Reference 8
Flood maps
Scotland:  https://www.sepa.org.uk/environment/water/flooding/flood-maps/

Reference 9
COMAH
HSE COMAH guidance:  http://www.hse.gov.uk/comah/guidance.htm

Reference 10
COSHH:
HSE Great Britain:  http://www.hse.gov.uk/coshh/
HSE Northern Ireland:  https://www.hseni.gov.uk/articles/coshh

Reference 11
Pesticides
Codes of practice for the use of plant protection products.


For Scotland – specific rules for pesticide storage can be found in General Binding Rule 23 (i) and (J) within the Controlled Activities Regulations Practical Guide (pp 24, 25) https://www.sepa.org.uk/media/34761/car_a_practical_guide.pdf

Reference 12
Installations for timber treatment

Reference 13
PIRP

Reference 14
Incident response

Reference 15
Duty of care for waste
In Scotland: Duty of care: A code of practice https://www.gov.scot/Publications/2012/10/2631

Reference 16
Safe storage and disposal of used oils
GPP 8: Safe storage and disposal of used oils http://www.netregs.org.uk/media/1435/gpp-8-v3-swni.pdf
12. Other useful sources of information

All the Pollution Prevention Guidance notes (PPGs) and the replacement series: Guidance for Pollution Prevention (GPPs) are available on the NetRegs website at:


Useful GPPs and PPGs:


Safe storage and disposal of used oils: GPP8  http://www.netregs.org.uk/media/1435/gpp-8-v3-swni.pdf

Useful websites:


The Department for Business Innovation and Skills:  www.bis.gov.uk

Government on-line business advice and support service:

- For Northern Ireland – NIBusinessInfo  https://www.nibusinessinfo.co.uk/
- For Scotland - Business Gateway www.bgateway.com
- For Wales – Business Wales:  https://businesswales.gov.wales/


Health and Safety Executive:  http://www.hse.gov.uk/

The Oil Care Campaign:  http://oilcare.org.uk/

Oil Storage Regulations, Regulators guidance.

- For Northern Ireland:  https://www.daera-ni.gov.uk/publications/control-pollution-oil-storage-regulations-northern-ireland-2010-guidance

Pesticides:

- BASIS (Registration) Limited:  http://www.basis-reg.com/
- HSE Chemicals Regulation Directorate, for pesticides information:  http://www.hse.gov.uk/pesticides/
Adblue:
- Federation of Petrol Suppliers (FPS) and Petrol Retailers Association (PRA): Safe storage and use of emission reduction solutions - eg AdBlue
  [http://www.ukpra.co.uk/_assets/ERS%20guide%20with%20FPS%20and%20PRA_Final_1.pdf](http://www.ukpra.co.uk/_assets/ERS%20guide%20with%20FPS%20and%20PRA_Final_1.pdf)

Waste minimisation information available from:
- In Northern Ireland: Wrap Northern Ireland
  [http://www.wrapni.org.uk/?gclid=EAIaIQobChMIq6Of1c-AbCh3Ni4QQWfJ1PD_BwE](http://www.wrapni.org.uk/?gclid=EAIaIQobChMIq6Of1c-AbCh3Ni4QQWfJ1PD_BwE)
- In Wales: Wrap Cymru: [http://www.wrapcymru.org.uk/about-wrap-cymru?gclid=EAlalQobChMig6Of1c-U3AIVSzobCh3SJO-TEAAYASAEgJ2MfD_BwE](http://www.wrapcymru.org.uk/about-wrap-cymru?gclid=EAlalQobChMig6Of1c-U3AIVSzobCh3SJO-TEAAYASAEgJ2MfD_BwE)

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**UK wide Incident/Pollution hotline:** 0800 80 70 60 (24 hrs)

**Floodline - England, Wales and Scotland:** 0845 988 1188

**Flooding incident line (NI):** 0300 2000 100

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**Natural Resources Wales**

[www.naturalresources.wales.gov.uk](http://www.naturalresources.wales.gov.uk)

HEAD OFFICE (Ty Cambria)
29 Newport Road,
Cardiff
CF24 0TP

Tel: 0300 065 3000 (Mon-Fri, 9am-5pm)

enquiries@naturalresources.wales.gov.uk

**Scottish Environment Protection Agency**

[www.sepa.org.uk](http://www.sepa.org.uk)

Strathallan House
The Castle Business Park
Stirling
FK9 4TZ

Tel: 03000 99 66 99

[http://www.sepa.org.uk/contact/](http://www.sepa.org.uk/contact/)

**Northern Ireland Environment Agency**


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