

## **CHAPTER XIV Hazardous Materials Management**

### **SUBJECT 1: Temporary Hazardous Materials Drum Storage**

#### **1401.01 Objective**

- A. To provide the City with a system that will maximize the safety of citizens and emergency responders, protect the environment, and minimize the cost to taxpayers when hazardous materials drums or containers are illegally abandoned on City property.
- B. To provide a system for the temporary storage and removal of hazardous materials drums or containers under an Environmental Protection Agency (EPA) emergency exemption granted to Municipalities.
- C. To support the Cincinnati Fire Department Environmental Crimes Unit (ECU) in the enforcement of hazardous materials code violations.

#### **1401.02 System Components**

- A. Drum storage building -The building for hazardous materials drums or containers temporary storage is located on the North side of Monmouth St. just West of Cormany St. (Camp Washington). It is a red brick building approximately 30' long and 15' wide with locked fence gates securing the openings. Keys are in possession of the Fire Department ECU and the Assistant Chiefs.
- B. Cincinnati Health Department lift gate truck - The Cincinnati Health Department Solid Waste Division has granted permission for Fire Department personnel to use a lift gate truck for transporting the hazardous materials drums or storage containers to the temporary storage building. Keys are in possession of ECU and the Health Department.
- C. Drum dolly and over-pack containers - A drum dolly and approved over-pack containers will be stored in the temporary storage building.
- D. Hazcat kit and appropriate monitoring/detection instrumentation.

### **1401.03 Background Information**

- A. The Cincinnati Fire, Health, and Public Works Departments, and the Office of Environmental Management have partnered to build a temporary drum storage building for the purpose of temporary hazardous materials drum storage. This building can facilitate 10-20 containers depending on the size of the drums or containers, and the number of overpacks necessary.
- B. When a hazardous materials drum or container is illegally abandoned on City property, the City becomes the 'owner' of the drum or container, and is responsible to pay for its removal and disposal at an approved hazardous materials remediation facility. The costs can escalate into thousands of dollars. If the violator can be apprehended and successfully prosecuted, he becomes responsible for the cost of the drum disposal. If the violator cannot be successfully prosecuted, the City must pay for the drum transportation and disposal.
- C. Thanks to the combined efforts of the respective City Departments and the Ohio Environmental Protection Agency (OEPA), there is an alternative. The City is able to take advantage of an emergency storage and transportation exemption under State and Federal law. Consequently, the drum or container in question can now be removed from the public right-of-way or other City property, and placed into a temporary storage building. At such time, arrangements will be made with the OEPA for drum disposal with all costs covered by the OEPA. This program is administered through the OEPA Orphan Drum Program.
- D. The Fire Department ECU, with assistance from the Health Department and select fire companies, will facilitate drum transportation to the storage building. ECU will also make arrangements with the OEPA Orphan Drum Program administrator for final removal from the City temporary storage building at minimal cost to the City.

#### 1401.04 Policy

- A. The following are criteria for drum remediation using the Orphan Drum Program:
1. The drum must contain hazardous materials such as solvents, petroleum products, alcohols, etc.
  2. Prior to removal or transportation, the drum **must** be properly characterized by ECU and Squad 52/Ladder 14 using the following tests:
    - Air monitoring (PID and Radiation)
    - \*\*\*- Shock sensitivity test
    - PH and Spill fighter test strip or equivalent
    - Hazcat test
    - Evidence samples (if required)
    - Drum must be sealed (and over-packed if necessary)
- \*\*\* Tests must show the drum to be shock-sensitive and explosive resistant prior to any movement by Fire personnel or remediation contractor employees
- \*\*\*\* Additional testing will always remain an option
- B. A Health Department tailgate lift truck will serve as the drum transportation vehicle. Presently, this vehicle is stored at the William Dooley by-pass Health Department facility.
- C. Fire companies may be requested to assist off-loading the drum(s) or containers from the lift truck into the temporary storage building.
- D. The temporary storage building is located near the Colerain Avenue Public Works facility at the intersection of Monmouth St. and Cormany St. in Camp Washington.
- E. ECU and Squad 52/Ladder 14 have the option to call for an approved remediation service (i.e. Clean Harbors or Petro Clean), if Fire/Health drum transportation and/or temporary storage would cause significant safety risks to personnel or the environment.
- F. **Safety** of Fire Department personnel and the public-at-large is the deciding factor for ECU when making the decision to use a remediation company or the temporary storage building.

**1401.05 Safety and Objectives**

- A. Safety of emergency responders and the citizens of Cincinnati.
- B. The safe, orderly, and timely removal of illegally discarded hazardous materials drums or containers from City property or the public right of way.
- C. A cleaner and safer environment.
- D. OEPA assistance with final removal of the hazardous materials drums or containers from the temporary storage building for the purpose of minimizing costs to the City.

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