

APPENDIX IV

DLCU Barrel Protocol

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Introduction

In order to determine the correct disposal method for barrels and their contents, the contents must first be identified. All barrel contents will be sampled and analyzed.

Analytical data obtained for the samples collected from barrels located at the site will be compared to the criteria included in Table 1, below. Barrel contents are identified as organic or aqueous and the concentrations of glycols, alcohols, PCBs, chlorine, cadmium, chromium and lead are determined. Uncontaminated aqueous phases can be disposed of on the land; uncontaminated organic phases can be incinerated; contaminated aqueous material should be scrubbed free of organic material; and contaminated organic material should be disposed of as hazardous material.

Table 1: Barrel Protocol Criteria and Disposal Summary

Phase	% glycols or alcohols	PCB	Cl	Cd	Cr	Pb	Disposal
Organic	-	<2	<1000	<2	<10	<100	Incineration
Organic	-	>2	>1000	>2	>10	>100	Ship south
Aqueous	>2 %	>2	>1000	>2	>10	>100	Ship south
Aqueous	>2 %	<2	<1000	<2	<10	<100	Incineration
Aqueous	<2%						Scrub and discard

1.1. Inspection

1. All barrels are to be inspected to address the following items which shall be recorded and used as a guide prior to opening barrels.
2. Symbols, words, or other marks on the barrel that identify its contents, and/or that its contents are hazardous: e.g. radioactive, explosive, corrosive, toxic, flammable.
3. Symbols, words, or other marks on the barrel that indicate that it contains discarded laboratory chemicals, reagents, or other potentially dangerous materials in small-volume containers.
4. Signs of deterioration or damage such as corrosion, rust, or leaks at seams, rims, and V grooves.
5. Spillage or discoloration on the top and sides of the barrel.
6. Signs that the barrel is under pressure such as bulging and swelling.

1.2. Sampling

1. Barrels shall not be transported until it has been determined that they are not under pressure, do not leak, and are sufficiently sound for transport.
2. Barrels to be sampled should be set in an upright position, provided that this does not cause them to leak and that it is physically possible.

3. Barrels should only be opened using heavy equipment, according to accepted procedures and under qualified supervision.
4. Once open, barrels will be sampled by personnel wearing proper personal protective gear. Samples of the contents of all barrels shall be extracted using a drum thief.
5. In instances where there are a large number of barrels with obviously similar contents, these can be grouped together and 30 to 40% of the barrels in the group sampled. Barrels containing less than 50 mm of liquid may be combined with compatible material prior to sampling; samples inferred to contain only water on a visual examination shall be tested prior to this consolidation. Barrel contents, which consist of black oil, shall not be consolidated.
6. All barrels shall be clearly numbered using spray paint or other suitable marker. The number on this label should be the only sample coding provided to the laboratory.
7. The barrel locations and barrel sample descriptions should be recorded.
8. Samples should be kept at ambient temperatures and shipped by guaranteed freight to laboratories where they should be kept cold pending analysis.

1.3. Testing

1. Liquid samples shall be inspected and classified as either containing water or organic materials. Samples thought to contain water shall be analyzed to confirm that they are indeed water, and contain less than 2% glycols or alcohols.
2. The contents of barrels containing organic materials, including aqueous samples which contain more than 2% glycols or alcohols, shall be tested for PCBs, total chlorine, cadmium, chromium and lead, in addition to identification of the major components e.g. fuel oil, lubricating oil.
3. Contents of barrels which contain two or more phases shall have all phases analyzed; the organic phases as described above and the aqueous phase to ascertain whether it contains less than 2% organic substances. In addition, the aqueous phase shall be tested for any components found in the organic phases above the criteria described below.

1.4. Disposal of Barrel Contents

1. Barrels containing only rust and sediment shall be treated as empty barrels.
2. Barrel contents comprising water only (less than 2% glycols or alcohols) shall be transferred to an open vessel such as a utility tub or half-barrel and any organic material removed by agitation with a pillow or segment of oil absorbent material. The water may then be discarded on to the ground that is a minimum of 30 meters distance from natural drainage courses. Used oil absorbent material shall be treated as described in below (D.5.).
3. Barrel contents which are composed of water with glycols and/or alcohols or organic phases, and which contain less than 2 ppm PCBs, 1000 ppm chlorine, 2 ppm cadmium, 10 ppm chromium, and 100 ppm lead, may be disposed of by incineration. Alternatively these contents may be disposed of off-site at a licensed disposal facility. The solid residual material resulting from incineration shall be subjected to a leachate extraction test. Material found to be not leachate toxic shall be disposed of as DCC Tier II contaminated soil. Leachate toxic material shall be treated as hazardous waste and disposed of off-site at a licensed disposal facility.
4. Barrel contents, which contain greater than 2 ppm PCBs, 1000 ppm chlorine, 2 ppm cadmium, 10 ppm chromium or 100 ppm lead shall be disposed of off-site at a licensed

disposal facility. Contents may be combined with compatible materials for shipping purposes. Flash points may be required to be determined if they cannot be inferred from the product identification.

5. Used oil absorbent material should be treated as hazardous waste and disposed of off-site at a licensed disposal facility. If it is shown to be uncontaminated with PCBs (< 2 ppm), chlorine (< 1000 ppm), cadmium (< 2 ppm), chromium (< 10 ppm) and lead (< 100 ppm), it may be incinerated on-site.

1.5. Disposal of Barrels

1. Empty barrels may be crushed or shredded and landfilled off-site as non-hazardous waste after they have been cleaned in an appropriate manner. The barrels shall be crushed in such a manner so as to reduce their volume by a minimum of 75%. Shredded barrels may be disposed of off-site as recycled metals.