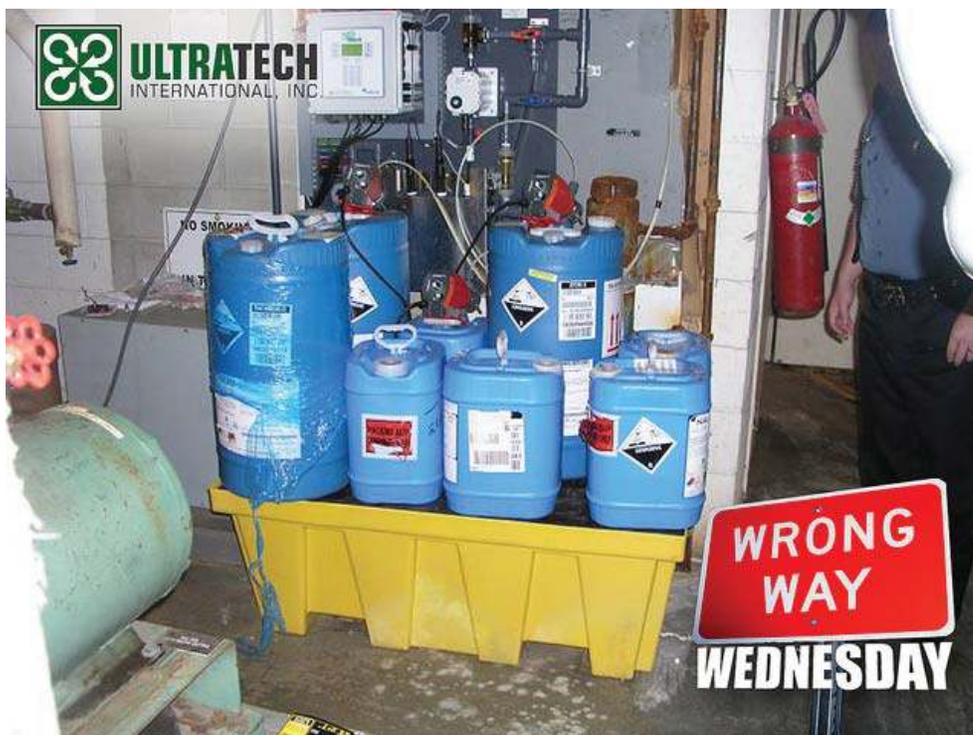


Wrong Way Wednesday | Jan. 20, 2016



Solution:



The obvious problem with today's "wrong way" scenario? THESE GUYS ARE USING SOMEONE ELSE'S SPILL PALLET!! That pallet is likely to cause blindness, seizures and spontaneous combustion. But the competition's shortcomings aside the other thing that jumps out is the ridiculous amount of containers crammed onto the top.

This seems to be an opportune moment to discuss one of the main regulations that makes spill containment necessary, 40 CFR 264.175.

www.spillcontainment.com, a world renowned environmental compliance website (and one with an incredibly good-looking webmaster) summarizes the regulation as follows:

1. The containment unit must underlie the containers and must be free of cracks or gaps and be sufficiently impervious to contain leaks, spills and accumulated precipitation.
2. The base of the containment unit must be sloped or designed to drain and remove liquids resulting from leaks, spills or precipitation, unless the containers are elevated or otherwise protected from contact with accumulated liquids.
3. The containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater.

#3 is usually the focal point of this reg. But actually, our WWW perpetrator's would meet that part of the regulation. There are (3) what appear to be 30-gallon containers and (5) 5-gallon containers, for a total of 115 gallons. The regulation requires 10% of the total volume (in this case 11.5 gallons) OR the single largest container, which in this case would be 30 gallons. So as messy and voluminous as this set up looks, the federal regulations only require 30 gallons. The capacity of this pallet is 66-gallons. Even if I guessed wrong on the larger drums and those were 55-gallons, the total would be 190 gallons, and the single largest container would be 55-gallons which would be the required sump capacity for the pallet.

The real issue here (potentially, depending on the inspector) is the first part of #1 in the summary, "The containment unit must underlie the containers..." It is pretty clear that the pallet does not underlie several of the containers and, depending on the location of a leak, would not be able to properly contain the spill.

The solution?

The obvious one would be to get a bigger pallet. More specifically, an ULTRA-Spill Pallet. But, if there is no additional floorspace available, the Ultra-Stacking Shelf could be used to provide additional space on top of the pallet.

And now you know. Happy Wednesday!