



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**Container Stacking Policy**

Compliance and Response Branch  
Office of Land Quality

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**Date Originally Adopted:** October 14, 1997

**Dates Revised:** March 1, 2014

**Citations Affected:** 329 IAC 3.1-10-1, 40 CFR 265.31 & 35, 40 CFR 265.174

**Brief Description of Subject Matter:** Regulated facilities have regularly requested a statement concerning the policy of stacking containers in storage. Because of these requests and because of the need to establish uniformity, the following policy is established.

This nonrule policy document is intended solely as guidance and does not have the effect of law or represent formal Indiana Department of Environmental Management (IDEM) decisions or final actions. This nonrule policy document shall be used in conjunction with applicable laws. It does not replace applicable laws, and if it conflicts with these laws, the laws shall control. A revision to this nonrule policy document may be put into effect by IDEM once the revised nonrule policy document is made available for public inspection and copying. IDEM will submit revisions to the Indiana Register for publication.

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## CONTAINER STACKING POLICY

Regulated facilities have regularly requested a statement concerning the policy of stacking containers in storage. Because of these requests and because of the need to establish uniformity, the following policy is established.

Based on the types of facilities normally inspected by staff, it is reasonable to require that fifty- five (55) gallon drums or other similar containers be stored in rows that are no more than two (2) 55 gallon drums high and two (2) 55 gallon drums wide. This decision takes into consideration the following;

- 1) Required inspections not only detect spills but also detect container deterioration caused by corrosion or other factors. This required inspection must be more thorough than that required for spill detection.
- 2) It is difficult to meet weekly storage inspection requirements if personnel are required to use extreme means to do so. Using extreme means, such as ladders, would be required when drums are more than two (2) high.

- 3) It is reasonable to require that rows be no more than two (2) drums wide. Drums inside the rows are not visible. This would require containers to be moved in order to perform an adequate inspection.
- 4) Variability in container strength and condition make it unwise to stack containers more than two (2) high. This puts unnecessary strain on the supporting containers. when a reasonable prediction cannot be made about their load bearing ability.
- 5) Variability in container dimensions can make stacking more than two (2) high risky because of the uncertain support given by the different container sizes.
- 6) Variability in the number of drums on each pallet may also lead to instability. It is not uncommon to find only three drums on a pallet.

The following three (3) regulatory requirements were reviewed in order to develop a general policy which addresses the majority of facility container storage or accumulation areas:

1. The basic requirement for the operation of facilities is that "Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned release of hazardous waste or hazardous constituents. . . " (329 IAC 3.1 -10-1 as adopted by reference from 40 CFR 265.31).
2. Container storage regulations state "The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility. . . " (329 IAC 3.1 -10-1 as adopted by reference from 40 CFR 265.35).
3. Waste must be stored so that the containers can be " . . . inspected for leaks and for deterioration caused by corrosion or other factors . . . " without moving them. (329 IAC 3.1 -10-1 as adopted by reference from 40 CFR 265.174).

This policy must not be construed to limit the agency's ability to deviate from the guidelines set forth in this policy statement when necessary. Deviations from this policy will not be considered for generators and facilities under interim status, but may be allowed for facilities during Part B permit negotiations as a permit condition.

**If need additional information, or have any questions or concerns, please contact staff of the Office of Land Quality, Compliance and Response Branch at 317-234-6923 or 1-800-451-6027.**