



## MEMORANDUM

Please be advised that secondary containment is required for containers of polluting substances if there is a risk that material could go down the drain or out a door to the environment. Specifically the regulations state,

*"Persons and municipalities engaged in an activity which includes the impoundment, production, processing, transportation, storage, use, application or disposal of polluting substances shall take necessary measures to prevent the substances from reaching waters of this Commonwealth, directly or indirectly, through accident, carelessness, maliciousness, hazards of weather or from another cause."* PA Code Title 25 Environmental Resources.

Conversations with the Pennsylvania Department of Environmental Protection have provided further clarification of this regulation. **Drums** of material, such as oils, fuels, anti freeze, etc. should be stored over secondary containment to catch any leaks or spills. If drums are stored in an area without drains and there is no risk of the material leaking out a doorway, secondary containment is not necessary. Where it is possible to do so, drains may be stoppered in lieu of providing secondary containment. Generally, the degree of toxicity and size of chemical containers in university labs permits them to be stored on shelves and in cabinets except when in drum quantities.