Federal Container
Containment Regulations & Assessments in Virginia

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In the fall of 2008, with pesticide containment rule less than a year away from implementation and no in-depth training and/or outreach material available it was decided that VDACS would develop the necessary materials.

Liza Fleeson (Program Manager), Doug Edwards (Enforcement Supervisor), and Robert Christian (Investigator) worked together to create training & inspection materials, outreach documents, and established on-site training for staff.
Containment Assessments

- An establishment inspection form along with a “Pesticide Containment Regulations: What you need to Know” outreach brochure was developed by the VDACS enforcement staff.

- Investigators attended an intense, in-house two day training session w/ hands-on field components.
Containment Assessments

- All facilities potentially affected were identified.
- Facilities were sent letters/brochures prior to assessments explaining the purpose of the proposed site assessment visits and following the actual assessment visits to advise of any necessary modifications which would need to be made by August 17, 2009.
- All facilities which were contacted consented to containment assessments.
Containment Assessments

- Information was gathered and reviewed by the Investigator and the Enforcement Supervisor, then shared with the firm.

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<th>Tank No.</th>
<th>Circumference</th>
<th>Diameter</th>
<th>Radius</th>
<th>Height</th>
<th>Cone Height</th>
<th>Cylinder Height</th>
<th>Tank Capacity</th>
<th>Gallons Displaced</th>
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Gallons Displaced: 72.00

Dimensions: Containment Pad: 1
- Length (ft): 77.07
- Width (ft): 80.00
- Height (ft): 0.30
- Total: 5,594 gallons

Dimensions: Containment Pad: 2
- Length (ft): 81.02
- Width (ft): 80.00
- Height (ft): 0.33
- Total: 5,429 gallons

Dimensions: Containment Pad: 3
- Length (ft): 77.07
- Width (ft): 80.00
- Height (ft): 0.35
- Total: 5,209 gallons

Center Dump Design
- Total: 5,429 gallons

Compliance: 3,418
- Largest tank: 672 gallons

Net Cont.: 2,946

All figures are approximate.
CONTAINMENT ASSESSMENTS IN VIRGINIA: BY THE NUMBERS

APPLICABLE FACILITIES INSPECTED – 53
- REFILLERS/REPACKAGERS – 43
- CUSTOM BLENDERS – 4
- COMMERCIAL APPLICATORS – 36

FACILITIES WITH NEW CONTAINMENT STRUCTURES - 0

FACILITIES WITH EXISTING CONTAINMENT STRUCTURES – 53

STATIONARY PESTICIDE CONTAINERS – 201 (ALL LIQUID)
FACILITIES AND CONTAINMENT ASSESSMENT FINDINGS

- NO MODIFICATIONS NEEDED: 48
- MODIFICATIONS NEEDED: 5

Diagram shows the breakdown of findings with 48 needing no modifications and 5 requiring modifications.
FACILITIES AND STRUCTURAL INTEGRITY

These cracks patched with polyurethane sealant then painted over with a concrete and Lucite mix.
FACILITIES AND STRUCTURAL INTEGRITY

- N=43 CRACKS
- N=10 NO CRACKS
FACILITIES AND CONTAINMENT
PADS

N=30

N=23

WITH PAD(S)

WITHOUT PAD(S)
FACILITIES AND ACCEPTABILITY OF STRUCTURAL MATERIALS
FACILITIES AND ACCEPTABILITY OF STRUCTURAL MATERIALS

N=44

N=9

ACCEPTABLE
UNACCEPTABLE
FACILITIES AND STATIONARY CONTAINERS ANCHORED OR ELEVATED
FACILITIES AND STATIONARY CONTAINERS ANCHORED OR ELEVATED

N=43

N=10
FACILITIES WITH SUFFICIENT CONTAINMENT UNIT CAPACITIES
FACILITIES WITH SUFFICIENT CONTAINMENT UNIT CAPACITIES

N=44

N=9

YES
NO
FACILITIES WITH ADEQUATE TRANSFER EQUIPMENT PROTECTION MEANS
FACILITIES WITH ADEQUATE TRANSFER EQUIPMENT PROTECTION MEANS

N=46

N=7

YES
NO
FACILITIES WITH SUFFICIENT FREEBOARD
FACILITIES WITH SUFFICIENT FREEBOARD

N=50

YES

NO

N=3
What we are doing now:

- The container and containment regulations have been and are still being discussed with the agrichemical industry in Virginia at numerous meetings.

- We conduct re-inspections at the facility’s request to verify corrections to deficiencies and to answer any question that arise as the repairs are being made.

- VDACS is currently in the process of adopting the Containment portion of the rule into our regulations.
Additional Information

- Environmental Protection Agency
  www.epa.gov/pesticides/regulating/containers.htm