

QUESTION: What recourse does one have in addressing a case of an accumulation of drums containing less than 2.5 cm of a volatile liquid like acetone which poses a danger as an ignitable vapor? Several drums are bloated, and the flash point of acetone is 100⁰F, 8⁰F less than the ambient temperature.

ANSWER: Under Section 261.7, only "empty" containers are exempt from regulation.

It is unclear whether these drums qualify for that exemption. The regulation does not allow one to simply leave an inch of residue in a container without attempting to empty it using practices commonly employed to remove materials from that type of container.

In addition, this situation may constitute an imminent hazard that could be addressed under Section 7003.

Source: Alan Corson

Research: Ken Jennings