

THE TRIALS OF INSTALLING MIXING & LOADING PADS

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As of October 29, 1992, the State of Michigan requires that an impervious pad be used for loading and washing pesticide application equipment. Fortunately, we have been given a one year period for which to get our various systems installed. What I would like to share with you today is the experience that I had this past summer of trying to install a system for my company.

I feel that, actually, I was rather fortunate because I had made the decision to move to a new location this year. Therefore, any constraints of removing any old system or retrofitting an old location were not going to be problems. I also, knowing that this rule was coming, had kept my eye out for likely systems and truly felt it would be an easy process. I was surprised at how difficult it turned out to be.

Let me tell you about what I had been using at my old location. Even though we weren't required to do so, we did use a rinse and loading pad and had been doing so for several years. It was a very simple, one might say crude, system, but then that might have described my entire location! The bottom line was that it worked. The trucks would pull in between two semi trailers which formed the walls of the system. Anything that might splash off to the side would hit the trailers and be directed down to the ground. On the ground we formed a catch basin out of parking blocks on the black top parking lot. We sealed the joints with black top patch. A sump was placed in the near corner with a standard heavy duty sump pump which took the water to a holding tank. Again, very simple, but it did the job.

Of course, there would have been one major deficiency with this system because of the new law. That is I could not have used a black top base. The other thing was that it was not covered and collected all the rain and snow that fell. So it was just as well I moved into a new location.

Now one thing I could not do was make a big investment in a rinse and loading pad. So I knew I was going to have to get creative. The language of the rule is very vague about details and that is causing some people some real concern about how to construct their pad. But, when we wrote this rule, we left the details out on purpose. We decided early on that we did not want to have very specific construction standards when there is such a wide variation of situations and applications in the pesticide application industry. We felt that it was best to describe what was needed to be accomplished, and leave it to the creativity of the individual as how best to accomplish it. While it might have been easier to spell out specifics, I believe that, in the end, we'll be glad we don't have those kinds of requirements.

Lets review really quickly what the regulation says. Rules Six and Seven require that all mixing, loading, and washing of pesticide application equipment be done on an impervious pad that will "contain

spills, leaks, releases or other discharges that are generated during the mixing and loading of pesticides" and the washing of pesticide equipment. Rule Six further specifies that the pad or holding tank be able to hold the amount discharged in one minute of a loading operation. If the pad is outdoors, it will also have to contain six inches of rainfall.

And basically that's it. So how was I going to do this? The options are almost endless, limited only by your imagination, budget and physical constraints of your facility. There are a couple of pads that can be purchased and placed on the floor or ground, add a pump and you're all set. Or you can always cut troughs, pads, and sumps into the floor of your garage. But not everybody has the budget or ability for those kinds of alternatives. Fortunately, there are other options.

What I decided to do was to get a coating for concrete that is impervious to chemicals and easy to apply. I will be squaring off the area in my shop with concrete blocks, seal the edges and apply this coating, and bingo, I'll have a rinse and loading pad. Of course you have to be sure that the pad is big enough for the amount of material you have to hold. But if you remember that one gallon equals 0.1337 cubic feet, you can quickly determine the needed holding capacity of your pad.

And there are even more possibilities. I've heard people talking about plastic liners inside concrete parking blocks, a small pad with a big tank and a good pump, fiberglass or plastic pads and on and on. The important thing is that you are not limited to only one style of pad. As long as it does what it is supposed to do, then you'll be in compliance. You have until October of 1993 to have your pad in place so there is no need to panic. But you do need to start thinking of how you will comply economically, creatively and responsibly.