

"Containment Buildings as Independent Hazardous Waste Management Units"  
(Key Words: Containment building; generator accumulation; TSDF)

QUESTION: EPA recently promulgated standards for a new hazardous waste management unit called a containment building under 40 CFR Parts 264 and 265, Subpart DD (57 FR 37194; August 18, 1992). EPA also amended Section 262.34(a)(1), allowing large quantity generators to accumulate and treat hazardous wastes on-site in containment buildings for 90 days or less without a permit or interim status. Must large quantity generators accumulating hazardous waste in containers or tanks under Sections 262.34(a)(1)(i) or (ii) now construct containment buildings to house their container or tank accumulation areas?

ANSWER: No, the new containment building regulations do not affect hazardous waste container, tank, or drip pad management standards at generator facilities and treatment or storage facilities operating under permits or interim status. EPA developed the containment building standards to provide large quantity generators and treatment and storage facilities with a new management unit for bulky, nonliquid hazardous wastes (e.g., lead-bearing materials from batteries) not amenable to accumulation, storage, or treatment in containers or tanks. Although a containment building can serve as a secondary containment system for hazardous waste tanks under certain conditions, there is no federal regulatory requirement to house existing containers, tanks, or other RCRA hazardous waste management units within a containment building (57 FR 37215; August 18, 1992). Containment buildings are intended to serve as independent hazardous waste management units. A large quantity generator accumulating hazardous wastes solely in containers, in tanks, or on drip pads in accordance with 40 CFR Sections 262.34(a)(1)(i), (ii), or (iii) is not required to comply with the standards for containment buildings specified in Section 262.34(a)(1)(iv). (November 1993 Monthly Hotline Report)