

9483.1983(03)

TANK INSPECTION PROCEDURES

21 SEP 83

MEMORANDUM

SUBJECT: Tank Inspection Procedures

FROM: Bruce R. Weddle, Acting Director  
State Programs and Resource Recovery Division

TO: Dennis Huebner, Chief  
State Waste Programs Branch, Region I

In your memorandum of August 29, 1983 to Steve Levy, you requested headquarters guidance regarding internal inspections of hazardous waste storage tanks. I hope that the following adequately answers the issues you raised.

The periodic inspection of tanks required by §264.194(b) should include a thorough visual inspection of the tank interior. This will usually involve emptying the tank and having an individual enter it to perform the inspection. It is our understanding that this can be done safely in all but very rare instances, so long as the proper equipment is used and appropriate safety precautions are followed. If a RCRA permit applicant does not wish to have its own facility personnel perform this type of inspection, there are a number of tank testing and inspection firms that can be hired to do so.

It may be possible, however, that an applicant could propose acceptable inspection procedures which do not involve physical entry into a tank. Such alternative procedures could be substituted in lieu of an internal visual inspection, if they were demonstrated to be equally effective in detecting "cracks, leaks, corrosion or erosion which may lead to cracks or leaks, or wall thinning..." [ref. §264.194(b)].

In answer to our question regarding alternative methods of performing internal inspections, we are not aware of any mechanical devices (e.g., video scanners) that are generally available and which would be effective for this type of inspection.

As indicated in previous guidance, the frequency of these periodic comprehensive tank inspections should be established based on the nature of the wastes being stored, tank shell material and age of the tank, anticipated

corrosion rates, the presence of liners or coatings, and other relevant factors.

Please let me know if you have any questions.

DFagan:dmf:9/21/83:disk Fagan 5