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STANDARDS FOR SECONDARY CONTAINMENT OF HAZARDOUS WASTE
TANK SYSTEMS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 9 1989

Mr. Larry Drake
Manager, HWST Programs
ENSR Constructors
3000 Richmond Ave.
Houston, Texas 77098

Dear Mr. Drake:

This letter is in response to your correspondence of November 22, 1988 to Bill Kline of my staff, in which you requested an additional clarification regarding the 40 CFR 264.193 and 265.193 standards for secondary containment of hazardous waste tank systems. Specifically, you asked if existing concrete secondary containment systems that are to be coated in accordance with §§264.193 and 265.193 must be certified by an independent, qualified, registered professional engineer (IQRPE).

As stated in paragraphs 264.191(a) and 265.191(a), any existing tank system (including the secondary containment system) that does not comply with the secondary containment requirements of §264.193 or §265.193, must have an integrity assessment that is certified by an IQRPE. Therefore, an existing concrete secondary containment system to which a coating or lining is applied to provide the enhanced level of impermeability to the concrete structure, required by §264.193 and §265.193, must be certified by an IQRPE.

Likewise, a coating or liner that is installed in conjunction with a new tank system (including secondary containment) or a liner that is installed to serve as secondary containment of an existing tank system, must receive an IQRPE's certification.

In situations when an IQRPE certification is not required, we would recommend, however, that the owner or operator obtain and

keep on file a statement from the coating/liner manufacturer or installer that indicates the compatibility of the coating/liner with the type of wastes that will be stored within the structure.

Please call Bill Kline at (202) 382-7917 if you have any further questions regarding the hazardous waste tank system standards.

Sincerely,

Original Document signed

David A. Bussard
Acting Director
Waste Management Division

cc: Bill Kline, WTB

bcc: Jim Berlow, WTB
Chet Oszman, PSPD
Kirsten Engle, OGC
Tim Kasten, OWPE
Tom Schruben, OUST
Region 1-10 Haz. Waste Division Directors