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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

MAY 87

1. Inspection Requirements for Hazardous Waste Tanks

An existing flat-bottomed tank containing hazardous waste sits on a concrete pad. The owner/operator cannot inspect the bottom of the tank nor the concrete pad for integrity. Is an inspection of the visible portions of the tank a satisfactory method for detecting leaks and corrosion under 40 CFR 264.195 and 265.195?

Any above-ground portions of a tank system are to be inspected daily for leaks and corrosion. Areas surround the externally accessible portions of the tank are to be inspected each day as well. In this case, the tank's bottom and the concrete pad cannot be observed. The intent of 40 CFR 264.195 and 265.195 is that all accessible and visible above-ground portions of tank systems be inspected at least once each operating day. In a case where the tank bottom is obscured from view (e.g., sitting on concrete), such an inspection is not feasible. However, special efforts should be made to carefully observe any leakage around the base of the tank. Such leakage would indicate releases from the tank bottom.

Furthermore, when secondary containment is provided in accordance with 40 CFR 264.193 and 265.193, the owner/operator must also provide a leak detection system capable of detecting any release from the tank bottom. Data gathered from leak detection equipment also must be inspected each operating day, and the owner/operator must inspect overfill controls and cathodic protection systems in accordance with 40 CFR 264.195 and 265.195. However, the owner/operator is not required to lift the tank in order to conduct this daily inspection. Likewise, daily internal inspections are not required.

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