

9483.1988(13)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JUNE 88

4. Hazardous Waste Tanks-Installation/Certification of Secondary Containment

The owner of an interim status hazardous waste storage facility is installing secondary containment on his tanks which were in existence and in use before July 14, 1986. If installation occurs after July 14, 1986, must it be certified by an independent installation inspector or independent registered professional engineer? If a piece of ancillary equipment, such as a pump or valve, needs to be replaced, must the replacement also be certified by an independent installer or engineer?

The standards in 40 CFR 264(5).192 require that the correct installation of new tanks systems or components be certified by an independent registered professional engineer or independent qualified installation inspector. The Agency's intent in promulgating this provision was that such a certification provides EPA with a means of knowing that hazardous waste tank systems were initially installed in a correct manner. EPA was concerned that many tank systems were being improperly installed thereby resulting in failure of the tank, piping, etc. The failures were of particular concern because in the absence of secondary containment many of these releases could go undetected indefinitely.

Proper installation on new tank systems and components is an ongoing concern to the Agency. However, it was not EPA's intent that every minor or routine replacement of a tank system component need recertification each time it is replaced. Replacement of valves, pumps, or even small sections of piping were not envisioned as needing recertification since they do not affect the structural integrity of the tank system. Rather, the Agency intends this requirement to apply to components affecting the system's structural integrity, e.g., the more major, non-routine and complex retrofit/replacement tasks. For example, the installation of new tanks including reinstallation of existing tanks, the installation of new secondary containment systems, and the replacement of extensive piping are relatively complex tasks that are critical to structural integrity and require oversight to ensure proper installation. This oversight is supplied by the independent registered professional engineer or independent qualified

installation inspector.

It is not feasible for the Agency to lay out a detailed menu of the items that do or do not need certification of installation. Facility owners and operators should contact the appropriate EPA Regional or State authorities to determine which new tank system components need certification of proper installation.

Source: Bill Kline (202) 382-7917

Research: Becky Cuthbertson