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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

MAY 88

7. Hazardous Waste Tanks - Existing vs. New Tank

An interim status treatment and storage facility stores liquid hazardous waste in several concrete sumps that are isolated from the other treatment and storage units on-site. The owner of the facility intends to install a hazardous waste storage tank inside of each sump. These sumps will now serve as secondary containment to the newly installed storage tanks.

Is this type of tank system modification regulated as a new tank installation, or is this practice recognized as providing secondary containment for an existing hazardous waste storage tank?

40 CFR Section 265.193 requires that secondary containment must be provided for new and existing tanks that treat or store hazardous waste at an interim status facility. Installing a tank in an existing hazardous waste sump or another tank to facilitate compliance with secondary containment requirements is one method being employed by the regulated community. This hazardous waste storage tank installation must be in compliance with the regulatory requirements for the design and installation of a new tank system or component in 40 CFR Section 265.192. A sump, now serving as secondary containment to the tank must be provided with a means of leak detection and must meet the technical requirements of Section 265.193(e)(1) and (2) and all other applicable provisions in Section 265.193.

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