9483.1988(06)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

APRIL 88

2. Secondary Containment for Hazardous Waste Tanks

A facility intends to install a series of underground hazardous waste accumulation tanks. The projected facility design specifies provisions for double walled tanks to meet the secondary containment requirements of Section 265.193. Section 265.193(e)(3)(i) states that the tank "must be: designed as an integral structure (i.e., an inner tank within an outer shell) so that any release from the inner tank is contained by the outer shell...." Does this imply that the void space between the primary waste tank and the secondary outer shell needs to be capable of containing one hundred percent (100%) of primary tanks contents?

No, secondary containment requirements for double walled hazardous waste tanks do not include provisions for containment of one hundred (100%) of the waste in the system's interstitial void. For the majority of such tank systems, inherent design criteria would make it unnecessary for such a specification. If a portion of the primary tank were to fail, the release would result in the two (2) tank systems acting as one (1) unit, whereby the entire contents of the primary tank would be confined within the overall structure. The properties of fluid dynamics would prevent a release (as long as spill and overfill protection where adequate) due to equilibrium of the waste volume between the primary tank and secondary tank.

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