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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JUNE 88

1. Hazardous Waste Tanks

An above ground tank was installed in 1976 and used to store product diesel fuel. In 1979 the tank ceased to store product and was used for hazardous waste storage. For purposes of 40 CFR 264.193 requirements, is the age of the tank calculated from 1976 or 1979?

The 1976 date should be used. The primary cause for tank failure, i.e., external corrosion, acts on the tank regardless of what substance is stored in the tank. Thus, the older the tank the higher the probability of failure. Likewise, although perhaps not in the same degree, many other modes of failure of tanks become increasingly probable with an increase in age of the tank. Because the intent of the regulation is to ensure secondary containment for aging tanks, the age of the tank itself, and not the time for which it has been subject to hazardous waste regulation is pertinent.

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