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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

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2. Hazardous Waste Tanks and Ground-Water Monitoring

The secondary containment regulations for hazardous waste tanks were promulgated in the July 14, 1986 Federal Register (51 FR 25422). These regulations establish strict secondary containment standards for new tank systems and require secondary containment retrofitting for existing tank systems. The full secondary containment standards of 40 CFR 264.193(a) and 265.193(c) include compatibility with the waste stored, structural integrity, a settlement-resistant base, and a release removal system. The proposed rule printed published in the June 26, 1985 Federal Register (50 FR 26444) provided for ground-water monitoring as an alternative to full secondary containment. Why was the ground-water monitoring alternative dropped in the final rule?

Proposed 40 CFR 264.193(f) and 265.193(e) allowed tank owner/ operators to use a combination of ground-water monitoring and partial secondary containment (a leakproof base and diking) in lieu of full secondary containment. This alternative was dropped because effective full secondary containment and leak detection would make ground-water monitoring unnecessary.

A risk analysis that was conducted subsequent to the June 26, 1985 proposed rule showed that the ground-water monitoring alternative was not as effective and thus not equivalent to secondary containment. In addition, numerous comments from the regulated community were submitted indicating that there were numerous technical difficulties in implementing an effective ground-water monitoring program for tank systems. EPA re-evaluated the ground-water monitoring option to secondary containment and concluded that it was neither practical nor as effective as secondary containment. The final regulations require in interstitial leak detection system in addition to full secondary containment (40 CFR 264.193(c)(3) and 265.193(c)(3)). interstitial leak detection monitors leaks in the space between the tank system and the secondary containment system, while ground-water monitoring detects releases after they have entered the environment (51 FR 25439). Early detection of well-contained leaks, therefore, is preferable to later detection of leaks

from a partial secondary containment system.

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