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## RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

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### 2. Leak Testing for Existing Hazardous Waste Tanks

Hazardous waste tank regulations, promulgated in the July 14, 1986 Federal Register (51 FR 25422), establish secondary containment standards for both new and existing hazardous waste tank systems. According to 40 CFR 264.192 and 265.192, new tank systems must be constructed to meet the secondary containment requirements, which include sufficient structural strength, a leak detection system, and corrosion protection. Sections 264.193 and 265.193 establish general schedules of compliance for existing tank systems to meet secondary containment requirements. Although new tanks and their ancillary equipment must be installed with special leak detection and collection systems, many existing tank systems may not have a mechanism to detect and contain releases. Do the new July 14, 1986 regulations have any leak testing requirement for existing tank systems prior to installation of secondary containment?

Yes, the new hazardous waste tank regulations do provide for leak testing in existing tank systems prior to installation of secondary containment. 40 CFR 264.193(i) and 265.193(i) require all existing tank systems to be evaluated for leaks in some manner. Non-enterable underground tanks must be tested for leaks at least annually. All other tanks (i.e., all above ground and enterable underground tanks) under interim status must be leak-tested, inspected internally, or examined for cracks, leaks, corrosion and erosion at least annually. Other permitted tanks must be either leak-tested annually or placed on a schedule for overall integrity assessments. The frequency of assessments would depend on the material of construction of the tank, the age of the system, the type of waste stored or treated, the type of corrosion or erosion protection, and the rate of corrosion or erosion of the tank. The annual leak testing requirement also applies to all ancillary equipment. In addition, §264.191 and §265.191 require the owner/operator of an existing tank system that does not have a secondary containment system meeting the requirements of §§264.193 and 265.193 to obtain a written assessment that attests to the tank system's integrity by January 12, 1988. All assessments

must be certified by an independent, qualified, registered professional engineer and must be kept on file at the facility.

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