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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

AUGUST 87

2. Tank Integrity Assessments

40 CFR 264.191 of the hazardous waste tank regulations was promulgated in the July 14, 1986 Federal Register. It requires owner/operators of existing tank systems without secondary containment to conduct an integrity assessment by January 12, 1988, to determine that the tank system is not leaking or unfit for use. Is an integrity assessment necessary for a hazardous waste tank system where the tank has secondary containment but the above-ground piping does not? Does the interpretation change if the tank is above-ground, in-ground or underground?

No. An integrity assessment is not required for hazardous waste tanks that have secondary containment even when the above-ground piping does not. 40 CFR 264.191 states that existing tank systems that do not have secondary containment and meet 40 CFR 264.193 requirements must perform an integrity assessment. A "tank system" includes both the tank and its ancillary equipment (e.g., attached piping).

Since the tank has secondary containment (provided it is in compliance with Section 264.193) and 40 CFR 264.193(f) excludes above-ground piping (exclusive of flanges, joints, valves and other connections) that is visually inspected for leaks on a daily basis from secondary containment requirements, the "tank system" has secondary containment meeting the requirements of Section 264.193. Therefore, it is not subject to the initial integrity assessment requirement. The above-ground, in-ground or underground classification of the tank would not influence the requirement.

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