

QUESTION: What is the difference between a tank and a surface impoundment?

ANSWER: According to the April 15, 1983 guidance memo from Bruce Weddle to Region IV, the unit should be evaluated as if it were free standing and filled to its design capacity with the material it is intended to hold. If the walls or shell of the unit provide enough structural support to maintain structural integrity of the unit under such conditions, the unit is a tank. If the unit needs supporting earthen materials to maintain its structural integrity, it is a surface impoundment. Engineering data and drawings may be necessary to make this determination.

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