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TANK AND SURFACE IMPOUNDMENT, DEFINITIONS

8 APR 83

MEMORANDUM

SUBJECT: Determination of Tanks vs. Surface Impoundments

FROM: Bruce R. Weddle
Acting Director
State Programs and Resource Recovery Division (WH-563)

TO: Thomas W. Devine
Director
Air and Waste Management Division, Region IV

In your memorandum of March 23, 1983 you requested headquarters guidance on the subject of how regional offices should determine what constitutes a "tank", as opposed to "surface impoundment," for RCRA permitting purposes. I hope that the following will serve to clarify this issue.

Distinguishing a tank from a surface impoundment is, as you suggest, primarily an assessment of what provides the unit's structural support. In making this assessment, 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 alone provide sufficient structural support to maintain the structural integrity of the unit under these conditions, the unit can be considered a tank. Accordingly, if the unit is not capable of retaining its structural integrity without supporting earthen materials, it must be considered a surface impoundment.

The units for which the State of Florida is requesting guidance should be assessed according to these criteria. From the sketches provided by Florida Power and Light, it would appear that the Sanford, Fort Myers, Manatee and St. Lucie units are probably surface impoundments, and that the Cutler unit may possibly be a tank. However, the information you submitted is not sufficient to enable us to make a definitive judgement in this regard. In order to support the contention that the units should be considered

tanks, you should request that Florida Power and Light submit engineering data and drawings which establish that each unit meets the above criteria.