

9483.1987(02)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

MARCH 87

8. Tanks Holding Hazardous Waste

Would video monitoring of the above-ground portions of a tank system meet the daily inspection requirements under §264.195(b)(1) and §265.195(a)(2)? Would video monitoring meet the requirements for a leak detection system for an above-ground tank system under §264.193(c)(3) and §265.193(c)(3)?

The regulations do not specify that any particular methods have to be used to meet the requirements of inspection or leak detection. As a result the use of video monitoring is not categorically excluded for either of the above uses. There would, however, be careful scrutiny of the effectiveness of such a system. The system would have to provide a level of performance comparable to actual close-up visual inspection of the entire system and the capability of effectively detecting leaks within 24 hours.

Source: William Kline (202) 382-7924
Specialist: Randy Eicher