

CLOSURE REQUIREMENTS FOR THE DISPOSAL OF STORAGE TANKS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 8 1987

Honorable Jim Jontz
House of Representatives
Washington, D.C. 20515

Dear Mr. Jontz:

Thank you for your March 10, 1987, letter in which you requested information regarding regulations on the disposal of storage tanks.

As you are probably aware, EPA regulates storage tanks under both Subtitle C and Subtitle I of the Resource Conservation and Recovery Act, as amended (RCRA). Tanks that are used for the storage or treatment of hazardous waste are regulated under Subtitle C of RCRA. On July 14, 1986, EPA promulgated revised standards for hazardous waste tank systems (51 FR 45422). A copy of these standards is enclosed for your convenience.

The hazardous waste tank system standards require that the owner or operator, at closure of a tank system, remove or decontaminate all waste residues, contaminated soil, contaminated containment system components and structures/equipment contaminated with waste. If these materials cannot be removed or decontaminated, the site itself must be managed as a hazardous waste landfill in accordance with __264.310 or 265.310.

Tanks, piping and other parts of the tank system that do not contain hazardous waste are not subject to any further Subtitle C requirements. The owner or operator may do what he wants with this equipment. For example, it could be salvaged, used elsewhere on site for another purpose, or abandoned on-site.

EPA recently published and made available to the public a document "Technical Resource Document for Storage and Treatment of Hazardous Waste in Tanks System" (NTIS No. PB-
-2-

87-134391) that provides information regarding compliance with the hazardous waste tank system standards. Chapter 12 of this document (a copy of which is enclosed) addresses closure and post-closure requirements. Among other things,

there is a discussion regarding the abandonment of tank systems in place. EPA recommends that the guidelines of the National Fire Protection Association (NFPA), as contained in "NFPA 30-Flammable and Combustible Liquids code, Appendix C. (Abandonment or Removal of Underground Tanks)" be followed. A copy of these guidelines is also enclosed.

Under Subtitle I of RCRA, EPA is currently developing separate standards for underground storage tanks containing "hazardous substances" as defined under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) or petroleum. These standards (which do not address storage of hazardous waste) are expected to be proposed in early april 1987, and will, like the Subtitle C rules, build upon the guidelines of NFPA 30.

If I can be of any further assistance, please let me know.

Sincerely,

J. Winston Porter
Assistance Administrator