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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JUNE 88

5. Hazardous Waste Tanks/Containers - Capacity of Secondary Containment

A hazardous waste storage facility is in the design stage. The owner/operator is designing the storage area for both hazardous waste tanks, and hazardous waste containers. A vault system will be designed to fulfill the requirements of secondary containment. The vault system will have sufficient capacity to contain 100% of the largest tank within its boundary. Hazardous waste containers will also be managed inside the vault system. The containers must be provided with a containment area which has sufficient capacity to contain 10% of the volume of containers, or the volume of the largest container, whichever is greater. The vault system, as designed for the hazardous waste tanks, has sufficient capacity in excess of the 10% container requirement. Must the owner/operator design the vault system for 100% of the largest tank plus 10% of the largest container, or will the 100% capacity supplied for the tanks also fulfill the containment requirement for the containers?

In order to prevent the release of hazardous waste or hazardous constituents to the environment, secondary containment is required for new hazardous waste tanks per Section 264.193. Container storage areas are also required to have secondary containment which will meet these same goals per Section 264.175(b)(3). Hazardous waste tanks, using a vault system, must be supplied with a volume equal to 100% of the largest capacity per Section 264.193(e)(2)(i). The container storage areas must be supplied with a volume of secondary capacity equal to 10% of the volume of containers or volume of the largest container, whichever is greater.

As long as the vault system has sufficient capacity to hold 100% of the largest tank inside the system, and that volume is greater than the amount of secondary containment required for the container storage area, both requirements have been fulfilled. The owner/operator would not have to supply the summation (i.e., 110%) of the required volumes for the secondary containment system.

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