WASTE MANAGEMENT & RADIATION CONTROL

Site:_____ EPA #: _____ Date:_____

# Large Quantity Generator Hazardous Waste Storage Tank Checklist

| INSPECTION ITEM | CITATION | COMMENTS |
|---|---|---|
| Is the tank clearly labeled with the words "Hazardous Waste"? | R315-262-17(a)(5)(ii)(A) | |
| Is the tank marked with an indication of the hazards of the contents?<br>Examples include (but not limited to) hazardous waste characteristic categories (ignitable, corrosive, reactive, toxic), D.O.T. hazmat labels and/or placards, OSHA hazard statement or pictogram, NFPA code 704 chemical hazard labels | R315-262-17(a)(5)(ii)(B) | |
| Is there an accumulation start date on the tank or in the operating record? (When was it last pumped dry?) Is that date <= 90 days? | R315-262-17(a)(5)(ii)(C) | |
| Is there a Preparedness and Prevention Plan? (see separate check list) | R315-262-17(a)(6)<br>R315-262-250 | |
| Operated to minimize chance of Spill or Fire?<br>Spill and Fire control equipment?<br>Emergency communication device: Internal?<br>Emergency communication device: External? | R315-262-251<br>R315-262-252(c)<br>R315-262-252(a)<br>R315-262-252(b) | |
| Is there a Contingency Plan? (see separate check list) | R315-262-17(a)(6)<br>R315-262-260 | |
| Description of actions that should be taken?<br>Name & Phone # for Emergency Coordinator?<br>Primary and alternate evacuation routes?<br>List of emergency equipment & location? | R315-262-261(a)<br>R315-262-261(d)<br>R315-262-261(f)<br>R315-262-261(e) | |
| Have personnel at this site successfully completed up to date Personnel Training on Hazardous Waste Handling & Fire & Spill Response?<br>Is the training documented? (see separate check list) | R315-262-17(a)(7)(i)(A)<br>R315-262-17(a)(7)(i)(B)<br>R315-262-17(a)(7)(i)(C)<br>R315-262-17(a)(7)(i)(D) | |
| <u>Tank System Design and Integrity</u>:<br>Does the owner/operator have a written assessment that has been reviewed and certified by a qualified Professional Engineer that includes the following?:<br>1. Design standards for construction<br>2. Hazardous characteristics for waste(s) to be managed in the system<br>3. Corrosion assessment for tank metal components contacting water or soil (if applicable)<br>4. If an underground tank, if adequate protection exists against vehicular traffic<br>5. Tank foundations will support full tank loading, adequate anchoring design to prevent dislodgement in flooding or due to seismic activity, and frost heave. | R315-262-17(a)(2)<br>40CFR265 Subpart J<br><br><br><br>40CFR265.191(b)<br>40CFR265.192(a) | |
| <u>Tank System Installation</u>:<br>Does the owner/operator have a written assessment(s) that attest to proper tank system installation and required repairs being performed?:<br>1. Structural inspection (welds, punctures, protective coating condition, cracks, corrosion, etc.)<br>2. Proper backfill for underground components<br>3. Tightness tests prior to being placed in use<br>4. Proper ancillary equipment support/protection<br>5. Proper corrosion protection installed. | 40CFR265.192(g)<br><br>40CFR265.192(b)<br>40CFR265.192(c)<br>40CFR265.192(d)<br>40CFR265.192(e)<br>40CFR265.192(f) | |

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| Containment and Detection of Releases:<br>Is the secondary containment system constructed of, or lined with materials compatible with the waste(s) that are placed in the tank system? | 40CFR265.193(c)(1) | |
| Is there a leak detection system that can detect failure of either the primary or secondary containment or any release of hazardous waste or liquid accumulation, within 24 hours, or as soon as practicable? | 40CFR265.193(c)(3) | |
| Are accumulated liquids (leaked waste, precipitation) being removed from the secondary containment within 24 hours, or as in a timely manner as possible to prevent harm to human health, or the environment? | 40CFR265.193(c)(4) | |
| Is the secondary containment one of the following types, or another that has been approved by the Director?<br>1. Liner (external to tank)<br>2. A vault<br>3. A double-walled tank? | 40CFR265.193(d) | |
| If the secondary containment is an external liner system or vault, is it designed or operated to contain 100% of the capacity of the largest tank within its boundary? | 40CFR265.193(e)(1)(i)<br>40CFR265.193(e)(2)(i) | |
| Is it designed or operated to prevent precipitation infiltration, or oversized to accomodate the additional precipitation volume of a 25-year, 24-hour rainfall event? | 40CFR265.193(e)(1)(ii)<br>40CFR265.193(e)(2)(ii) | |
| General Operating Requirements: | 40CFR265.194 | |
| 1) Hazardous waste or treatment reagents placed in the tank must be compatible with the construction materials of the tank system. | 40CFR265.194(a) | |
| 2) The owner/operator must use appropriate controls to minimize spills and overfills from the tank. Prevention measures must include:<br>1. Spill prevention controls (check valves, dry disconnect couplings, etc.) | 40CFR265.194(b)(1) | |
| 2. Overfill prevention controls (level sensing devices, high level alarms, automatic feed cutoff/bypass to alternate tank, etc.) | 40CFR265.194(b)(2) | |
| 3. Maintenance of adequate freeboard in uncovered tanks to prevent overtopping by wave or wind action, or by precipitation. | 40CFR265.194(b)(3) | |
| Response to leaks or spills:<br>Is the owner/operator immediately stopping the flow of hazardous waste to the tank system or secondary containment system in the event of a spill or leak? | 40CFR265.196<br>40CFR265.196(a) | |
| Is the owner/operator removing waste leaks to the secondary containment system within 24 hours after detection, or as soon as practicable? | 40CFR265.196(b) | |
| Is the owner/operator notifying the Director with 24 hours of detection of a hazardous waste leak or spill that results in a release of more than 1 lb. of hazardous waste to the environment? | 40CFR265.196(d) | |

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| Inspection Requirements: | 40CFR265.195 | |
| 1) The owner\operator must conduct daily inspections of: the overfill\spill control equipment, aboveground portion to determine presence of a leak or corrosion, data gathered from leak detection equipment, and secondary containment. | 40CFR265.195(a)(1)<br>40CFR265.195(a)(2)<br>40CFR265.195(a)(3)<br>40CFR265.195(1) | |
| 2) If the owner/operator has a cathodic protection system it must be inspected 6 months after installation and annually thereafter. | 40CFR265.195(f)(1) | |
| 3) All sources of impressed current must be inspected and/or tested at least bimonthly. | 40CFR265.195(f)(2) | |
| 4) The owner/operator must maintain documentation that records the above inspections. | 40CFR265.195(g) | |
| Requirement for Ignitable or Reactive Wastes: | 40CFR265.198 | |
| 1) The owner/operator must NOT place ignitable or reactive wastes in a tank, unless the following measures are taken: | 40CFR265.198(a) | |
| a) The waste was treated, rendered, or mixed before or immediately after placement in the tank so that the resultant waste, mixture, or dissolved material is no longer ignitable (D001) or reactive (D003).<br>AND<br>If the owner\operator is treating or commingling incompatible waste, or incompatible waste and materials, the process must not generate extreme heat or pressure, fire or explosions, or violent reaction; produce uncontrolled toxic mists, fumes, dusts, or gases that would threaten human health; produce an uncontrolled fumes or gases that would pose a risk of fire or explosion; damage the structural integrity of the device or facility containing the waste; or threaten human health or the environment by other means | 40CFR265.198(a)(1)<br>40CFR265.198(a)(1)(i)<br>40CFR265.198(a)(1)(ii)<br>40CFR265.17(b) | |
| OR<br>b) The waste is stored or treated in such a way that it is protected from any material or conditions which may cause it to ignite or react | 40CFR265.198(a)(2) | |
| OR<br>c) the tank is used solely for emergencies | 40CFR265.198(a)(3) | |