WASTE MANAGEMENT & RADIATION CONTROL

Site:_____ EPA #: _____ Date:_____

Small Quantity Generator Hazardous Waste Storage Tank Checklist

INSPECTION ITEM	CITATION	COMMENTS
General Operating Requirements:	R315-262-16(b)(3)(ii)	
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	R315-262-16(b)(3)(ii)(A) R315-265-1 40CFR265.17(b)	
Hazardous wastes or treatment reagents placed in the tank must not cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life.	R315-262-16(b)(3)(ii)(B)	
For uncovered tanks, operations must be conducted to ensure at least 2 feet of freeboard (60 cm), unless the tank is equipped with a containment structure (dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of the top 2 feet (60 cm) of the tank.	R315-262-16(b)(3)(ii)(C)	
If hazardous waste is continuously fed into the tank, the tank must be equipped with a means to stop the inflow (e.g., feed cutoff system, bypass to a standby tank, etc.).	R315-262-16(b)(3)(ii)(D)	
Inspection Requirements:	R315-262-16(b)(3)(iii)	
Required inspections once each operating day: Discharge control equipment (feed cutoff systems, bypass systems, drainage systems, etc.) must be in good working order.	R315-262-16(b)(3)(iii)(A)	
Monitoring equipment data (pressure, temperature, etc.) must be checked to ensure the tank is being operated in accordance with design parameters.	R315-262-16(b)(3)(iii)(B)	
Level of waste in the tank, to ensure compliance with freeboard requirements in R315-262-16(b)(3)(ii)(C).	R315-262-16(b)(3)(iii)(C)	
Required inspections at least weekly: The integrity of the construction materials of the tank, for purposes of detecting corrosion or leakage from fixtures or seams.	R315-262-16(b)(3)(iii)(D)	
The construction materials of, and area immediately surrounding discharge confinement structures (e.g., dikes) to detect erosion or signs of leakage (wet spots, dead vegetation, etc.).	R315-262-16(b)(3)(iii)(E)	
If the tanks have full secondary containment and use either leak detection equipment to alert for leaks, or implement established workplace practices to ensure leaks are promply identified, the inspections in R315-262-16(b)(3)(iii)(A) through (C) (once each operating day inspections in prior section), and R315-262-16(b)(3)(iii)(D) and (E) (at least weekly inspections just above) can all be performed at least weekly. *Note: If this option is used, the alternate schedule must be documented in the operating record, and include a description of the established workplace practices being used.*	R315-262-16(b)(3)(iv)	

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INSPECTION ITEM	CITATION	COMMENTS
Requirements for Ignitable or Reactive Wastes:	R315-262-16(b)(3)(vii)	
1) The owner/operator must NOT place ignitable or reactive wastes in a tank, unless the following measures are taken:		
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).	R315-262-16(b)(3)(vii)(A)(1)	
AND 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. 17(b)	
OR b) The waste is stored or treated in such a way that it is protected from any material or conditions that may cause it to ignite or react	R315-262-16(b)(3)(vii)(A)(2)	
OR c) the tank is used solely for emergencies	R315-262-16(b)(3)(vii)(A)(3)	
If ignitable or reactive waste is being stored in a covered tank, the buffer zone requirements for tanks contained in Tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code" must be complied with.		
Requirements for Incompatible Wastes:	R315-262-16(b)(3)(vii)(C)	
Incompatible wastes, or incompatible wastes and materials cannot be placed into the same tank, unless 40CFR265.17(b) is complied with (*See 40CFR265.17(b) reference in "Requirements for Ignitable or Reactive Wastes" section on this page above)*	R315-262-16(b)(3)(vii)(C)(1)	
Hazardous waste must not be placed into an unwashed tank that previously held an incompatible waste or material, unless 40CFR265.17(b) is complied with *(See 40CFR265.17(b) reference in "Requirements for Ignitable or Reactive Wastes" section on this page above)*	R315-262-16(b)(3)(vii)(C)(2)	