

US EPA ARCHIVE DOCUMENT

CHECKLIST FOR REVIEW OF FEDERAL RCRA PERMIT APPLICATIONS				
SECTION D. PROCESS INFORMATION - TANKS				
Section and Requirement	Federal Regulation	Review Consideration^a	Location in Application^b	See Attached Comment Number^c
D-2 Tank Systems	270.16; 264.191 - 194			
D-2a Tank Systems Descriptions	270.14(b)(1)	Describe type (aboveground, underground) and specific location of each tank.		
D-2a(1) Dimensions and Capacity of each Tank	270.16(b)			
D-2a(2) Description of Feed Systems, Safety Cutoff, Bypass Systems, and Pressure Controls	270.16(c); 264.194(b)			
D-2a(3) Diagram of Piping, Instrumentation, and Process Flow	270.16(d)			
D-2a(4) Ignitable, Reactive, and Incompatible Wastes	270.16(j); 264.17(b); 264.198,199	Demonstrate that waste is stored or treated in a way that protects against ignition or reaction.		
D-2b Existing Tank Systems				
D-2b(1) Assessment of Existing Tank System's Integrity	270.16(a); 264.191	A written tank assessment must be certified by an independent, qualified, registered professional engineer.		
D-2c New Tank System				
D-2c(1) Assessment of New Tank System's Integrity	270.16(a),(e); 264.192(a)	A written tank assessment must be certified by an independent, qualified, registered professional engineer.		
D-2c(2) Description of Tank System Installation and Testing Plans and Procedures	270.16(f); 264.192(b) - (e)	A new tank installation must be inspected by an independent, qualified, installation inspector or registered professional		

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		engineer.		
D-2d	Containment and Detection of Releases	270.16(g); 264.193	Leak detection system must be capable of detecting leaks within 24 hours.	
D-2d(1)	Plans and Description of the Design, Construction, and Operation of the Secondary Containment System	270.16(g); 264.193(b) - (f)		
D-2d(1)(a)	Tank Age Determination	270.16(g); 264.193(a)	Age of each tank must be accurately determined to ascertain when secondary containment requirements apply.	
D-2d(1)(b)	Requirements for Secondary Containment and Leak Detection	270.16(g); 264.193(b),(c); 264.1101(b)(3)(iii)	A detailed description of the construction, installation, and operation of the secondary containment system is required.	
D-2d(1)(c)	Requirements for External Liner, Vault, Double-walled Tank or Equivalent Device	270.16(g); 264.193(d),(e)	Secondary containment must consist of liner, vault, double-walled tank, or equivalent device approved by regional administrator.	
D-2d(1)(d)	Secondary Containment and Leak Detection Requirements for Ancillary Equipment	270.16(g); 264.193(f)	Secondary containment is required for ancillary equipment except as provided in 264.193(f).	
D-2d(1)(e)	Containment Buildings Used as Secondary Containment for Tank Systems	270.16(g); 264.1101(b)(3)(iii)	A containment building can serve as secondary containment for a tank system provided it meets requirements of 264.193(b),(c)(1&2),(d)(1).	
D-2d(2)	Requirements for Tank Systems until Secondary Containment is Implemented	270.16(h); 264.193(i)	Annual leak tests are required until secondary containment is provided.	

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D-2d(3)	Variance from Secondary Containment Requirements	270.16(h); 264.193(g)		
D-2d(3)(a)	Variance Based on a Demonstration of Equivalent Protection of Groundwater and Surface Water	270.16(h)(1); 264.193(g)(1),(h)	Detailed plans and engineering and hydrogeologic reports are required to demonstrate equivalent protection of groundwater and surface water.	
D-2d(3)(b)	Variance Based on a Demonstration of No Substantial Present or Potential Hazard	270.16(h)(2); 264.193(g)(2),(h)	Provide detailed assessment of substantial present or potential hazards posed to human health or the environment, should a release enter the environment.	
D-2d(3)(c)	Exemption Based on No Free Liquids and Location Inside a Building	270.16(h); 264.190(a)	Demonstrate that tanks used to treat or store hazardous waste contain no free liquid as defined by Paint Filter Test (SW-846 Method 9095).	
D-2e	Controls and Practices to Prevent Spills and Overflows	270.16(i); 264.194(a),(b); 264.195	Provide detailed description of controls and practices used to prevent spills and overflows.	

- Notes:
- ^a Considerations in addition to the requirements presented in the regulations.
 - ^b For each requirement, this column must indicate one of the following: NA for not applicable, IM for information missing, or the exact location of the information in the application.
 - ^c If application is deficient in an area, prepare a comment describing the deficiency, attach it to the checklist, and reference the comment in this column.