

Idaho Department of Environmental Quality



Managing UST Test Water

January 14, 2016

What Are We Talking About?

Potential hazardous waste issues related to managing hydrostatic test fluids from USTs:

- Spill buckets
- Tank sumps
- Dispenser sumps

Residues in these can cause the test fluids to be regulated as hazardous waste.

Testing Preparation

- Inspect the spill bucket or sump. If liquid, residue, or debris is found it should be carefully removed prior to testing and properly disposed.
- Clean thoroughly!
- Fuel, rags, absorbents, water and other materials may need to be managed as hazardous waste

Test Fluid

- Strongly recommend using new test fluid each time
- Contaminants build up in reused test fluid
- You must determine if the test fluid is a hazardous waste
- If reused test fluid leaks to the environment from a sump, or is spilled, you must address the release

Resource Conservation and Recovery Act “RCRA”

- Defines and regulates Hazardous Waste
- “Cradle to Grave” regulation



Is it a Hazardous Waste?

Analytical tests:

- Ignitability - Flash point $< 140^{\circ}\text{F}$ (60°C) using Pensky-Martens or Setaflash closed cup tester (unlikely with typical test fluids)
- Toxicity: Using the TCLP (Toxicity Characteristic Leaching Procedure)

Is it a Hazardous Waste?

- Benzene is the most likely constituent to make it a hazardous waste (D018)
- TCLP test – approximately \$200 or more per sample for liquids
- TCLP extraction on solids – an additional \$175 or more per sample
- Can “declare” it a hazardous waste and avoid testing

Is It a Hazardous Waste?

- YOU must figure out if it is or not. This is called a **Hazardous Waste Determination**. It's required by law. 40 CFR Part 262.11
- Include this step in your planning.
- DEQ can help if you have questions.

Is it a Hazardous Waste?

- If testing shows it is equal to or greater than 0.5 mg/L Benzene, it is a hazardous waste
- Equivalent to one half of one part per million

How Much is Half of One Part Per Million (PPM)? Roughly:

- Two drops of ink in one 55-gallon barrel
- One inch in 8 miles
- One second in 6 days
- One minute in one year

While You're Waiting for Test Results...

- No mixing of test fluids from different locations prior to receiving test results
- No dilution
- Don't mix potentially hazardous and non-hazardous fluids
- Label containers, "Test Fluids Pending Analysis" and mark the date on them

If Testing Shows the Test Fluids are Non-Hazardous...

- Dispose at an authorized facility.
Examples: wastewater treatment plant if they're willing to accept it, or Idaho Waste Systems for solidification and landfill disposal
- May not be disposed in storm drains, surface water, or on the land

Hazardous Waste Transportation and Disposal

- If test fluid is hazardous waste, it must be managed in accordance with all applicable requirements (see handout)
- Store in closed, labeled, dated containers or tanks, comply with storage time limits
- Obtain an EPA Identification Number

EPA ID Numbers

- To obtain an EPA Identification Number, contact Rene' Anderson at DEQ, at:

(208) 373-0210 or

Rene.Anderson@deq.idaho.gov

Hazardous Waste Labeling Requirements

Containers must be labeled “Hazardous Waste” and dated.

Make sure they’re closed and secure. Must be inspected at least weekly.

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME _____
ADDRESS _____ PHONE _____
CITY _____ STATE _____ ZIP _____
EPA / MANIFEST
ID NO. / DOCUMENT NO. _____ / _____
ACCUMULATION EPA WASTE
START DATE _____ NO. _____

WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE
SOLID, NOS.
UN3077
D.O.T PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

Hazardous Waste Transportation and Disposal

- Uniform Hazardous Waste Manifest
- Use a registered hazardous waste transporter. Prepare waste properly for shipping (packaging, labeling, marking, placarding).

Hazardous Waste Transportation and Disposal

- Dispose at a permitted hazardous waste facility or other location authorized to accept the waste (wastewater treatment plant if they're willing to accept it)
- Comply with recordkeeping and reporting requirements including an **ANNUAL REPORT** to DEQ!

The Uniform Hazardous Waste Manifest

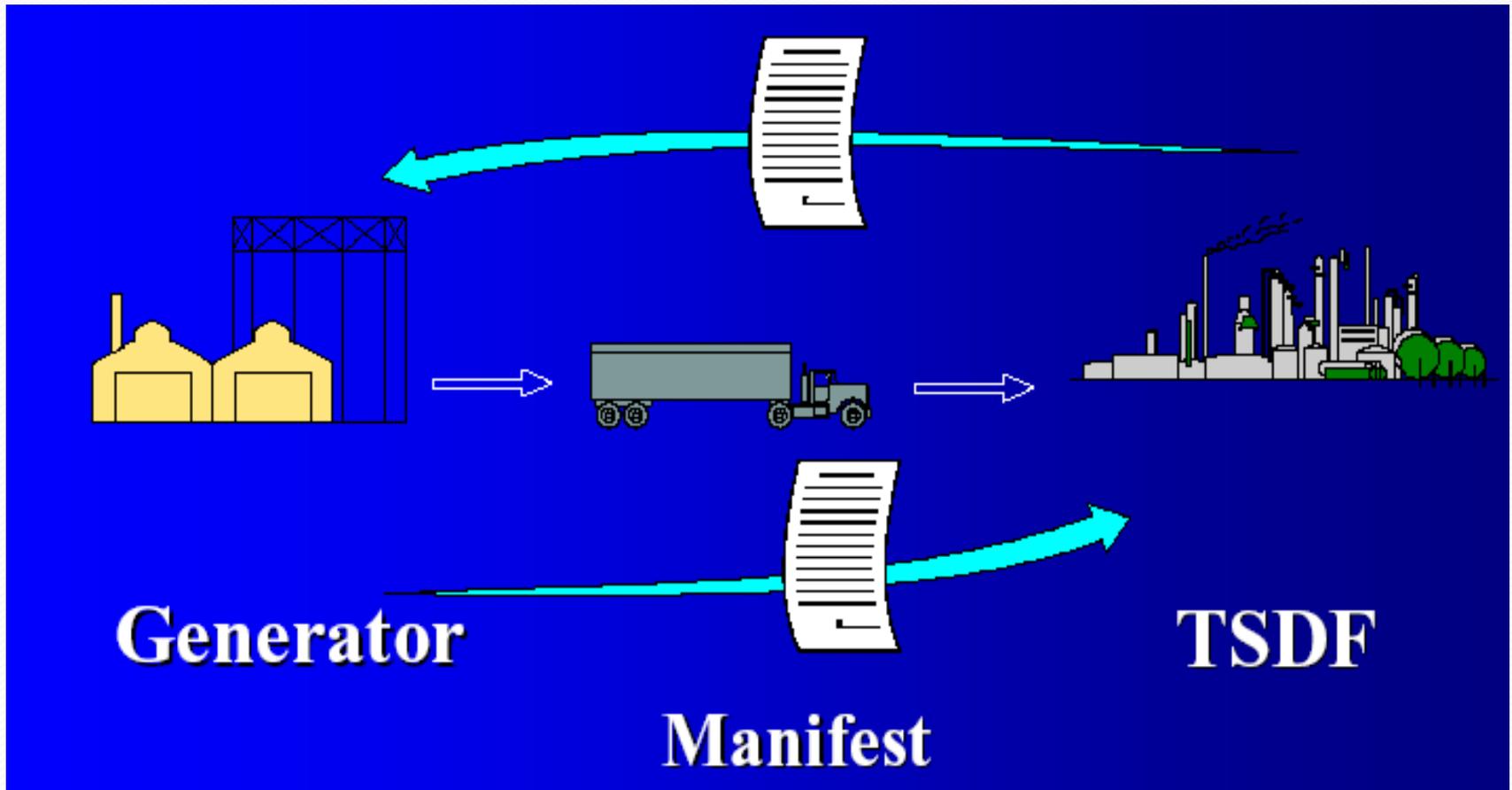
- Form that tracks the movement of hazardous waste from the point of generation to the point of ultimate disposal
- Doubles as the shipping document for DOT

Revised 01/01/01 (Form subject to amendment) (Use previous editions only if approved by the EPA) (Form approved by the EPA on 01/01/01)

| UNIFORM HAZARDOUS WASTE MANIFEST | | Generator's US EPA ID No. | Manifest Document No. | Page 1 of 2 Information on this manifest form is not required by Federal law | |
|---|---------------------|--|-----------------------|---|---------------------------|
| 1. Generator's Name and Mailing Address | | | | A. State Hazardous Waste Number | |
| 4. Generator's Phone () | | | | B. State Generator's ID | |
| 2. Transporter's Company Name | 3. US EPA ID Number | | | C. State Transporter's ID | |
| 7. Transporter's Company Phone | 6. US EPA ID Number | | | D. Transporter's Phone | |
| 5. Designated Facility Name and ZIP Address | | 10. US EPA ID Number | | | E. State Transporter's ID |
| | | | | F. Transporter's Phone | |
| | | | | G. State Facility's ID | |
| | | | | H. Facility's Phone | |
| 11. UICET Description (Including Proper Shipping Name, Hazard Class, and ID Number) | | 12. Carcasses | 13. Total Quantity | 14. UICET (EPCRA) | |
| | | No. | Weight | 1. Waste No. | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| J. Additional Descriptions for Materials Listed Above | | K. Handling Codes for Materials Listed Above | | | |
| | | | | | |
| 15. Special Handling Instructions and Additional Information | | | | | |
| | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this manifest are fully and accurately described above to proper shipping name and are classified, packaged, labeled, and sealed in all respects in proper condition for transport by highway according to applicable Federal and State government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. (S, H, or U are a special quantity generator. I have made a good faith effort to reduce or reuse waste generation and toxicity based on management and that it is available to me and that I can offer.) | | | | | |
| Period of Time | | Signature | | Month Day Year | |
| 17. Transporter's Acknowledgment of Receipt of Materials | | Signature | | Month Day Year | |
| 18. Transporter's Acknowledgment of Receipt of Materials | | Signature | | Month Day Year | |
| 19. Emergency Information Space | | | | | |
| 20. Facility Owner or Operator Certification of Receipt of Hazardous Materials covered by this manifest except as noted on Form 800 | | Signature | | Month Day Year | |
| Period of Time | | Signature | | Month Day Year | |

The Form version is 20 (Jan. 2001) Previous editions are obsolete.

Manifest Cycle



Who is the Generator of the Waste?

- More than one person can be considered the generator of a hazardous waste
- When two or more parties are cogenerators, they should mutually agree (by contract or other means) who will perform the duties of the generator on behalf of the other parties

Hazardous Waste

UST owners/operators and UST service providers must comply with the same hazardous waste rules as other businesses

Service provider can assume generator duties but it is still a shared responsibility!

Why Is This Important?

- Liability
- Responsibility

Owners, operators, and service providers share the liability and responsibility. You have the duty to make sure it's done right! It's about protecting you.

DEQ Inspections

DEQ may inspect your site, observe operations, review records, and possibly take samples. The purpose is to determine your compliance with the hazardous waste rules.

Know where your records are!

Other Approaches

Although the hydrostatic test is the most common, other approaches may be preferable:

- Vacuum methods generate no hazardous waste
- Install new double-walled sumps (no testing)

Questions?

Natalie Clough

Hazardous Waste Compliance Manager

Department of Environmental Quality

(208) 373-0506

Natalie.Clough@deq.idaho.gov

