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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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MEMORANDUMSUBJECT: Regional Policy to Remove Waste Codes from the Contents
of Working TanksFROM: Michael ~~St~~ Sanderson, Chief
RCRA Branch

TO: Section Chiefs

The attached procedure has been approved for use in Region
VII of the Environmental Protection Agency.

Attachment

* ~~@@~~ Received this from Hardlaw
site visit on Dec. 17, 96 —faxed to
Doug O. 1/29/97

PROCEDURE TO REMOVE WASTE CODES
FROM THE
CONTENTS OF A WORKING TANK

Issue

It is impractical to completely drain large storage and feed tanks at a commercial treat/store/dispose (TSD) facility. Because of the mixture rule, once a specific hazardous waste has been placed in such a tank, that hazardous waste code theoretically would continue to be present no matter how many volumes of different wastes were processed through that tank. Over a period of time, the administrative burden could become unmanageable.

The following procedure will determine that a tank is empty for the purpose of applying the hazardous waste code(s) of the previous materials to the new wastes placed in that vessel. This procedure is not designed to identify decontamination procedures for the purpose of removing a tank from service or for closure procedures. This procedure is valid only when the subject tank will continue to process hazardous wastes.

The following procedure requires that incompatible wastes will not be combined in the tank and that there is adequate agitation to prevent separation of the constituents.

The procedure identifies the activities necessary when the tank has held acutely hazardous wastes, other listed hazardous wastes, and characteristic wastes.

Acutely Hazardous Wastes

1. All wastes must be removed from the tank using normal procedures; and
2. The residue from the original waste must be less than 0.3% by volume of the designed effective working volume of the tank; and
3. The tank must be rinsed with an appropriate cleaning material until the acutely hazardous material is not present in the rinsate at levels detectable using standard SW-846 procedures or other procedures approved by the EPA Regional Office or the appropriate State Agency. The rinsate will be acutely hazardous until the original acutely hazardous material is not present at detectable levels.

Other Listed Hazardous Wastes

1. The hazardous waste must be removed from the tank until the residue from the listed waste by volume is less

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than 0.3% of the designed effective working volume of the tank; and

2. The original listed hazardous waste is not present in the new material (in the tank) at levels detectable using standard SW-846 procedures or other procedures approved by the EPA Regional Office or the appropriate State Agency.

Characteristic Wastes

1. The characteristic waste must be removed from the tank until the residue from the characteristic waste by volume is less than 0.3% of the designed effective working volume of the tank; and
2. The original characteristic waste is not present in the new material (in the tank) at levels above those specified as regulated under the Toxic Characteristic (TC) Rule.

The above procedures apply to storage tanks, feed tanks, and related piping, valves and pumps normally used in the specific tank operation.