

Idaho Department of Environmental Quality



Managing UST Test Water

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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.



Recommendations for Owners/Operators

- ✓ Inspect and clean the spill buckets or sumps prior to testing
- ✓ Use new test fluid each time
- ✓ Label containers, “Test Fluids Pending Analysis” and mark the date on them



Is It a Hazardous Waste?

- The generator 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
- Advise them to include this step in their planning.
- DEQ can help if they have questions.



Is it a Hazardous Waste?

Analytical tests:

- Ignitability - Flash point $< 140^{\circ}\text{F}$ (60°C) (**unlikely** with typical test fluids)
- Toxicity: Using the TCLP test (Toxicity Characteristic Leaching Procedure)



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



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

- Ship to a wastewater treatment plant
- Discharge to sewer in compliance with your permit
- Idaho Waste Systems for solidification and landfill disposal
- May not be disposed in storm drains, surface water, or on the land



If it's Hazardous Waste...

- Store in closed, labeled, dated containers or tanks, comply with storage time limits
- Check with wastewater treatment plant, or
- Send it to be reclaimed, or
- Ship as hazardous waste using a transporter with an EPA ID number



Who is the Generator of the Waste?

- More than one person can be considered the generator of a hazardous waste
- UST owner/operator and contractor should mutually agree on who will perform the duties of the generator on behalf of the other parties, including proper disposal



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?

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