Test Facility (116832)
HW LQG Tank

GENERAL REQUIREMENTS	Answer	Violation
1. Are all tanks marked with the words 'Hazardous Waste'? **40 CFR 262.34(a)(3)**		
2. Are all tanks marked with the accumulation start date? **K.A.R. 28-31-262(c)(5)**		
LQG REQUIREMENTS	**Answer**	**Violation**
3. Note: If the tank or tank system was used to store hazardous waste prior to July 14, 1986, then it is an existing tank system. If the tank did not begin service, or did not contain hazardous waste until after July 14, 1986, then it is a new tank system.		
4. Has the generator determined that the existing tank system is not leaking or unfit for use by obtaining and keeping on file at the facility a written assessment reviewed and certified by a qualified Professional Engineer that attests to the tank system¿s integrity or does the tank system have a secondary containment system meeting the **40 CFR 265.191(a)**		
5. Does the written assessment of the existing tank system meet the requirements of 40 CFR 265.191(b) as agreed to by a KDHE hazardous waste professional engineer? Note: If this has not been assessed on previous inspections, request that the facility submit the documents to you and request that a HW permit engineer review them for compliance with the regulations. **40 CFR 265.191(b)**		
6. Has the generator had an assessment by a Professional Engineer attesting that the system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste? Note: If this has not been assessed on previous inspections, request that the facility submit the documents to you and request that a HW permit engineer review them for compliance with the regulations. **40 CFR 265.192(a)**		
7. Does the generator maintain on-site at the facility written statements by persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the requirements of paragraphs (b) through (f) of this section to attest that the tank system was properly designed and installed and that repairs, were performed. Paragraphs (b) through (f) include the following: (b) Proper handling during installation;(c) Proper backfill material and procedures for components and piping placed underground; (d) Tightness testing for tanks and ancillary equipment; (e) Supporting and protecting ancillary equipment to protect from stress and physical damage; (f) Corrosion protection. **40 CFR 265.192(g)**		
8. Does secondary containment meet the following requirements (unless the generator has received a variance under 40 CFR 265.193(g)) **40 CFR 265.193(c)**		

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LQG REQUIREMENTS	Answer	Violation
8a. Constructed of or lined with materials compatible with the waste and of sufficient strength? **40 CFR 265.193(c)(1)**		
8b. Placed on a structurally adequate foundation or base? **40 CFR 265.193(c)(2)**		
8c. Provided with a leak detection system capable of detecting releases within 24 hours (or alternate time depending on technology)? **40 CFR 265.193(c)(3)**		
8d. Adequately sloped or designed or operated to drain and remove liquids from leaks, spills or precipitation within 24 hours (if possible)? **40 CFR 265.193(c)(4)**		
8e. Does the secondary containment include one of the following: **40 CFR 265.193(d)**		
9. Does the secondary containment satisfy the following requirements: **40 CFR 265.193(e)**		
9a. For External Liner		
9a1. Adequate capacity to contain 100% of the volume of the largest tank within its boundary? **40 CFR 265.193(e)(1)(i)**		
9a2. Designed or operated to prevent run-on or infiltration of precipitation into the containment system unless it has excess capacity to contain a 25-year, 24-hour rain event? **40 CFR 265.193(e)(1)(ii)**		
9a3. Free of cracks or gaps? **40 CFR 265.193(e)(1)(iii)**		
9a4. Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs? **40 CFR 265.193(e)(1)(iv)**		
9b. For Vaults		
9b1. Adequate capacity to contain 100% of the volume of the largest tank within its boundary? **40 CFR 265.193(e)(2)(i)**		

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LQG REQUIREMENTS	Answer	Violation
9b2. Designed or operated to prevent run-on or infiltration of precipitation into the containment system unless it has excess capacity to contain a 25-year, 24-hour rain event? **40 CFR 265.193(e)(2)(ii)**		
9b3. Constructed with chemical-resistant water stops at all joints? **40 CFR 265.193(e)(2)(iii)**		
9b4. Provided with an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste being stored or treated? **40 CFR 265.193(e)(2)(iv)**		
9b5. Protected against vapor ignition, if required due to ignitable or reactive characteristics of the waste? **40 CFR 265.193(e)(2)(v)**		
9b6. Provided with an exterior moisture barrier or designed and operated to prevent migration of moisture into the vault? **40 CFR 265.193(e)(2)(vi)**		
9c. For Double-Walled Tanks		
9c1. Designed as an integral structure so that outer tank contains any release from inner tank? **40 CFR 265.193(e)(3)(i)**		
9c2. If metal, are both the interior of the primary tank and external surface of the outer shell protected from corrosion? **40 CFR 265.193(e)(3)(ii)**		
9c3. Provided with a built-in continuous leak detection system capable of detecting releases within 24 hours? **40 CFR 265.193(e)(3)(iii)**		
10. Is ancillary equipment provided with adequate secondary containment, except aboveground piping (exclusive of flanges, valves, and connections), welded flanges, welded joints, welded connections, sealless or magnetic coupling pumps, sealless valves, pressurized aboveground piping with an automatic shut-off device, any of which when present, are visually inspected daily for leaks? **40 CFR 265.193(f)**		
11. Does the generator avoid placing hazardous wastes or treatment reagents into a tank system if they could cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail? **40 CFR 265.194(a)**		

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LQG REQUIREMENTS	Answer	Violation
12. Does the generator use appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems, including (mark yes on the following if they apply, NA if they do not): **40 CFR 265.194(b)**		
12a. Spill prevention controls (e.g. check valves, dry discount couplings); **40 CFR 265.194(b)(1)**		
12b. Overfill prevention controls (e.g. level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank); and **40 CFR 265.194(b)(2)**		
12c. Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action or by precipitation. **40 CFR 265.194(b)**		
13. If a spill or leak occurred in the tank system, did the generator comply with the requirements of 40 CFR 265.196 for 'Response to leaks or spills and disposition of leaking or unfit-for-use tank systems?' **40 CFR 265.194(c)**		
14. Does the generator inspect the following at least once each operating day (unless either leak detection equipment or KDHE approved established workplace practices ensure leaks are promptly identified, in which case inspections are weekly): **40 CFR 265.195(b)**		
14a. Data from monitoring and leak detection equipment; Note: Must be done daily (no weekly option). **40 CFR 265.195(a)**		
14b. Overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems); **40 CFR 265.195(b)(1)**		
14c. Above-ground portions of the tanks system to detect corrosion or releases; **40 CFR 265.195(b)(2)**		
14d. Areas around tank and the secondary containment to detect leaks, (wet spots, dead vegetation, etc.)? **40 CFR 265.195(b)(3)**		
14e. Ancillary equipment that is not provided with secondary containment; **40 CFR 265.195(e)**		
15. Are the inspections required in question 14.a, b, c, and d above documented in the operating record or another log? **40 CFR 265.195(g)**		

LQG REQUIREMENTS	Answer	Violation
15. If the tank has cathodic protection systems, was the following schedule adhered to? **40 CFR 265.195(f)**		
15a. Was proper operation confirmed within 6 months of installation and annually after that. **40 CFR 265.195(f)(1)**		
15b. Are impressed current sources inspected/tested at least bimonthly? **40 CFR 265.195(f)(2)**		
16. If ignitable or reactive waste is placed in a tank system was at least one of the following requirements adhered to? (mark yes on the following if they apply, NA if they do not): **40 CFR 265.198(a)**		
16a. The waste is treated, rendered, or mixed before or immediately after placement in the tank system so that the resulting mixture is no longer ignitable or reactive and the requirements of 40 CFR 265.17(b) (see question 28) is complied with; or **40 CFR 265.198(a)(1)**		
16b. The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react; or **40 CFR 265.198(a)(2)**		
16c. The tank system is used solely for emergencies. **40 CFR 265.198(a)(3)**		
17. NOTE: If ignitable or reactive waste is stored or treated in tanks, request that the facility submit a description of how they are complying with National Fire protection Association (NFPA) standards for maintaining protective distances as required in 40 CFR 265.198(b) (if they have not submitted the information to KDHE already).		
18. Are the requirements of 40 CFR 265.17(b) complied with for ignitable and reactive wastes? See below for requirements of 40 CFR 265.17(b): **40 CFR 265.198(a)(1)**		
19. Are the requirements of 40 CFR 265.17(b) complied with for tanks that were not decontaminated prior to adding incompatible waste (or that previously held incompatible wastes or materials)? Note: See below for the requirements of 40 CFR 265.17(b). **40 CFR 265.199(a)**		
20. Following is a list of the requirements of 40 CFR 265.17(b):		

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LQG REQUIREMENTS	Answer	Violation
20a. not generate extreme heat or pressure, fire, or explosion, or violent reaction;		
20b. not produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health;		
20c. not produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;		
20d. not damage the structural integrity of the device or facility containing the waste; or		
20e. not threaten human health or the environment through other like means.		
21. Is all hazardous waste placed in a tank managed in accordance with the applicable requirements of subparts AA, BB, and CC of 40 CFR 265? **40 CFR 265.202**		