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Title: Equivalent Secondary Containment Devices for Hazardous Waste Tanks Containing Baghouse Dust
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Dates Revised: None
Other Policies Repealed or Amended: None
Brief Description of Subject Matter: Provides generic variance for secondary containment for silo systems that meet performance standards of 40 CFR 265.193
Citations Affected: 40 CFR 265.193, 329 IAC 3.1

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Equivalent Secondary Containment Devices for Hazardous Waste Tanks Containing Baghouse Dust

The purpose of this document is to approve equivalent containment devices, pursuant to 40 CFR 265.193 which has been adopted by reference at 329 IAC 3.1, for generator hazardous waste tanks containing baghouse dust.

Companies with air pollution control baghouses have connected storage tanks to their baghouses by piping or ductwork. Some of the tanks are placed on legs so trucks can drive under them for loading purposes. These are often referred to as silos. Other tanks are on the ground and the waste is sucked out of the tanks with vacuum trucks. Some facilities have taken the position that the tanks are part of their air pollution control equipment and that the tanks are not regulated under RCRA and the dust is not regulated until the dust exits the tank. IDEM considers generator tanks/silos that receive hazardous dust from baghouses to be regulated hazardous waste storage tanks.

Because secondary containment requirements in the rules are more oriented towards liquids, typical secondary containment requirements applicable to tanks are not relevant for

baghouse dust or practical for use of the tanks as loading silos. However, it has been IDEM's experience that releases from these units are common, particularly during loading of trucks. Fugitive dust from leaks, spillage during unloading, and tire track-out are the most common problems.

The rules currently exempt tanks containing waste with no free liquids, and that are located inside buildings, from secondary containment. IDEM agrees with operators of baghouse dust storage tanks that enclosing these units in buildings or installing the standard containment is not always practical or functionally appropriate. The hazardous waste tank rules at 40 CFR 265.193 provide that the Commissioner may approve an equivalent device that meets the secondary containment requirements.

With this document the Commissioner is approving the use of equivalent devices for secondary containment for generator baghouse storage tanks that meet the following performance standards:

1. Devices, typically concrete or asphalt pads, must be designed, installed and operated to prevent hazardous waste contact with soils. Pavement should be maintained free of cracks and gaps and run-on and run-off should be controlled or prevented. Paving, curbs, and routine sweeping may be utilized to prevent releases to the soil from spills and tire track out.
2. Releases to the air must be prevented or immediately recaptured. IDEM anticipates devices such as windscreens, loading bays with curtains, or vacuums will be utilized to prevent airborne dispersal.
3. Devices must be provided with a means of detecting and removing releases immediately during routine operations, or within 24 hours at the latest. Typically, facilities utilize attendants during loading/unloading operations and daily inspections to satisfy this requirement.
4. The device must be designed to contain 100% of the capacity of the largest tank. An asphalt or concrete pad must be large enough to contain a pile of the baghouse dust if it is accidentally released from a storage tank.

Devices meeting these performance standards are approved in order to ensure flexibility for the regulated community and still fulfill the purpose of secondary containment (to prevent releases to the environment).

If you need additional information, or have any questions or concerns, please contact staff of the Compliance Branch, Office of Land Quality at 317-234-6923. The IDEM toll-free telephone number is 1-800-451-6027.