



SMALL QUANTITY GENERATOR TANK REQUIREMENTS

THIS POLICY DOES NOT HAVE THE FORCE OF LAW

Hazardous Waste

The purpose of this guidance is to provide a quick reference for DHWM inspectors and small quantity generators who accumulate or treat hazardous waste in tanks.

What is regulated under the rules?

The entire tank system is regulated under the rules. A tank system is a hazardous waste storage or treatment tank and its associated ancillary equipment and containment system.

Tanks

A hazardous waste tank is any device that would meet all of the following:

- Stationary;
- Made of non-earthen materials;
- Accumulates hazardous waste.

Note: Regardless of size, if the vessel, a container and/or a drum if it is never moved, it is considered a tank.

Ancillary Equipment

Ancillary equipment means any device such as piping, fittings, flanges, valves, and pumps from the waste's point of generation to the tank, between the tank(s), and until the waste leaves the facility for disposal.

Containment System

Secondary containment systems must prevent any migration of wastes or accumulated liquid out of the tank system to the soil, ground water, or surface water. General examples are liners, vaults and double walled tanks. These should be capable of detecting and collecting releases and accumulated liquids.

Note: SQGs are not subject to the secondary containment requirements for storing or treating hazardous waste in tanks.

Are there requirements for all hazardous waste generators accumulating or treating hazardous waste in tanks?

No, Conditionally Exempt Small Quantity Generators (CESQGs) are not subject to the tank system requirements for accumulation of hazardous waste. However, CESQGs who wish to treat hazardous waste in tanks must comply with the Large Quantity Generator (LQG) requirements found in Ohio Administrative Code (OAC) rule **3745-52-34(A)**.

SMALL QUANTITY GENERATOR TANK REQUIREMENTS

Requirements for SQGs Accumulating and/or Treating Hazardous Waste in Tanks

Small Quantity Generators (SQGs) who accumulate and/or treat hazardous waste in tanks must carefully read the tank system requirements for operating, inspecting and closing tanks, found at OAC rule [3745-66-101](#). As a SQG you can treat or accumulate your hazardous waste in a tank provided you can document that the entire volume of the tank has either been emptied within 180 days (or 270 days if the waste is to be shipped over 200 miles) or if the entire volume of the tank is turned over completely within the time limit. A tank is considered empty when the generator has left the tank's drainage system open until a steady, continuous flow has ceased.

Small Quantity Generator Operating Requirements

- Label the tank "Hazardous Waste" when accumulating or treating hazardous waste on-site.
- Have a tracking system to ensure that waste has not been accumulated in the tank for more than 180 days (or 270 days if the waste is to be shipped over 200 miles).
- Take precautions to prevent accidental ignition or reaction of ignitable or reactive waste.
- Prevent the tank or its inner liner from rupturing, leaking, corroding, or otherwise failing before the end of its intended life, including using proper treatment reagents.
- Operate uncovered tanks to ensure two feet of freeboard, unless the tank is equipped with a containment structure such as a dike or a trench, a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of the top two feet of the tank.
- When hazardous waste is continuously fed into a tank, the tank must be equipped with a means to stop this inflow with the use of a waste-feed cutoff system to a stand-by tank.

Small Quantity Generator Inspection Requirements

The following are inspection requirements. SQGs should document these inspections and when found, deterioration or malfunctions must be documented and remedied as soon as possible.

- Inspect discharge control equipment such as waste-feed cutoff systems, by-pass systems, and drainage systems at least once each operating day¹
- Inspect data gathered from monitoring equipment; such as pressure and temperature gauges, at least once each operating day
- Inspect the level of waste in uncovered tanks at least once each operating day to ensure compliance with tank freeboard requirements
- Inspect tank systems to detect corrosion or leaking of fixtures or seams once per week
- Inspect the area immediately surrounding discharge confinement structures (e.g., dikes, secondary containment) for obvious signs of leakage (e.g., wet spots or dead vegetation) once per week. Weekly means an event that must occur once within a seven day period following the previous event

Small Quantity Generator Requirements for Managing Ignitable or Reactive Waste

- Ignitable or reactive waste must not be placed in a tank, unless:
 - the treatment, storage, or disposal of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials, must be conducted so that it does not:

¹ Ohio EPA interprets the requirement to inspect a tank "once each operating day" to be once each day that the tank system is being used to manage (accumulate or treat) hazardous waste. When employees are not present 7 days a week, there is a possibility to use a remote camera system, which could be used to inspect the tank system components required.

SMALL QUANTITY GENERATOR TANK REQUIREMENTS

- Generate extreme heat or pressure, fire or explosion, or violent reaction;
- Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health;
- Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
- Damage the structural integrity of the device or facility containing the waste; or
- Through other like means threaten human health or the environment.
- 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
- The tank is used solely for emergencies.
- The owner or operator of a facility which treats or stores ignitable or reactive waste in covered tanks must comply with the buffer zone requirements for tanks contained in tables 2-1 to 2-62.3.2.1.1(a) and 2.3.2.1.1(b) and tables 2.3.2.1.2 to 2.3.2.1.5 of the national fire protection association's "Flammable and Combustible Liquids Code".

Small Quantity Generator Closure Requirements

Upon closure of the facility, generators must remove all hazardous waste in tanks, discharge control equipment, and discharge confinement structures. Small quantity generators are not required to submit a formal closure plan.

References and Resources for SQG Tank Requirements

DMWMs Engineering, Remediation and Authorization Section is available to help with questions about tank requirements and designs. To find a DMWM staff member visit our [Web page](#) or call 614-644-2921.

- DHWM's Publications Web site <http://www.epa.ohio.gov/pic/facts/fslist.aspx>
- Tank Advisory <http://epa.ohio.gov/portals/32/pdf/tankdoc.pdf>
- Generator Handbook http://epa.ohio.gov/portals/32/pdf/gen_handbook.pdf
- Generator Treatment Guidance http://epa.ohio.gov/portals/32/pdf/Generator_Treatment_Guidance.pdf
- State Board of Registration for Professional Engineers <http://peps.ohio.gov/LicenseLookup.aspx>
- Closure Plan Review Guidance <http://epa.ohio.gov/portals/32/pdf/2008CPRG.pdf>
- *NOAA's National Weather Service's Precipitation Frequency Data Server*
- *NOAA's National Weather Service's Rainfall Frequency Atlas Map*
- *Ohio DNR's Division of Water, Water Inventory*

OAC rule [3745-50-10](#) (definitions)

OAC rule [3745-52-34](#) (accumulation of waste)

OAC rule [3745-66-90](#) (applicability of rules)

OAC rule [3745-66-101](#) (SQG requirements)

Contact

For more information, contact the Hazardous Waste Compliance and Inspection Support *Division of Materials and Waste Management* at 614-644-2921.