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# **TECHNICAL DOCUMENT**

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## **GUIDELINES FOR REUSE AND DISPOSAL OF HYDROSTATIC TEST LIQUIDS**

**Technical Guidance Number  
263-4200-003**

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# **STORAGE TANK PROGRAM**

**DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Bureau of Environmental Cleanup and Brownfields**

**DOCUMENT NUMBER:** 263-4200-003

**TITLE:** Guidelines for Reuse and Disposal of Hydrostatic Test Liquids

**EFFECTIVE DATE:** [effective date]

**AUTHORITY:** The Clean Streams Law, 35 P.S. §§ 691.1-691.1001, as amended, the Solid Waste Management Act, 35 P.S. §§ 6018.101-6018.1003, as amended, the Waste Transportation Safety Act, 27 Pa.C.S. §§ 6201-6209, as amended, The Hazardous Sites Cleanup Act, 35 P.S. §§ 6020.101-6020.1305, as amended, The Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 et seq. as amended, the Storage Tank and Spill Prevention Act, 35 P.S. §§ 6021.101-6021.2104, as amended (Tank Act), 25 Pa. Code Chapter 245 (Storage Tank Regulations), Section 1917-A of the Administrative Code, 71 P.S. § 510-17.

**POLICY:** It is the policy of the Department of Environmental Protection (Department or DEP) to carry out the provisions of the Tank Act and related Storage Tank Regulations.

**PURPOSE:** Storage Tank Regulations require periodic testing of spill prevention equipment and containment sumps at underground storage tank (UST) facilities to ensure the equipment is liquid-tight. This document provides general guidelines for proper use and reuse of test liquids and proper disposal of waste test liquids generated during hydrostatic testing.

**APPLICABILITY:** The attached guidance applies to hydrostatic testing of all spill prevention equipment and containment sumps associated with regulated UST systems. This guidance is applicable to certified inspectors and installers of UST facilities. It may also be useful to UST owners/operators to consider their options for meeting the Department's periodic testing requirements and properly managing wastes resulting from periodic testing.

**DISCLAIMER:** The policies and procedures outlined in this guidance are intended to supplement existing requirements. Nothing in the policies or procedures shall affect regulatory requirements.

The policies and procedures herein are not an adjudication or a regulation. DEP does not intend to give the rules in these policies that weight or deference. This document establishes the framework within which DEP will exercise its administrative discretion in the future. DEP reserves the discretion to deviate from this policy statement if circumstances warrant.

**PAGE LENGTH:** 10 pages

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## I. INTRODUCTION

Effective November 10, 2007, the Department of Environmental Protection (DEP) has required that all spill prevention equipment and containment sumps be tested for liquid tightness at installation and following any repair (See 25 Pa Code §§ 245.434(5) and 245.421(b)(4)(ii)). Revisions to the Federal Regulations in 40 CFR Part 280 require additional periodic testing of spill prevention equipment and containment sumps used for interstitial monitoring of double-walled piping associated with regulated underground storage tank (UST) systems. The Department is required to adopt regulations no less stringent than federal regulations. As such, the Department has adopted the following additional requirements:

Spill prevention equipment must be:

- tested for liquid tightness by a DEP-certified individual at least every three years,  
OR
- double-walled, and the integrity of both walls must be monitored at a minimum of every 30 days.

Containment sumps used for interstitial monitoring of double-walled piping must be:

- tested for liquid tightness by a DEP-certified individual at least every three years,  
OR
- double-walled, and the integrity of both walls must be monitored at a minimum of every 12 months.

As a result of these requirements, the Department expects an increase in the amount of potentially contaminated wastewater generated during hydrostatic testing. This guidance addresses hydrostatic testing procedures and hydrostatic test liquid reuse, management, and disposal concerns at regulated UST sites.

Used hydrostatic test water may constitute a solid waste. All test liquids that are considered a solid waste must be collected, stored, transported, and processed or treated, and disposed of (collectively: “managed”) in accordance with the Solid Waste Management Act (SWMA), the Waste Transportation Safety Act, and applicable Federal and State regulations. All solid waste must be managed as hazardous waste until it is determined that it is non-hazardous.

To save on costs associated with the proper management of solid wastes, UST system owners should consider using double-walled spill prevention equipment and containment sumps or vacuum testing in lieu of hydrostatic testing.

While other acceptable options may be available for proper management of waste hydrostatic test liquids, the Department believes that adhering to this guidance will result in compliance with the applicable laws and regulations.

## II. APPLICABILITY

This guidance applies to hydrostatic testing of all spill prevention equipment and containment sumps associated with regulated UST systems and any hydrostatic test liquid used in the process.

## III. PROCEDURES

Before adding hydrostatic test liquid to spill prevention equipment or containment sumps, the tester should complete the following:

- remove any liquid and debris from the spill prevention equipment or containment sump;
- visually examine the spill prevention equipment or containment sump for defects, damage, or improperly installed components which may allow the test liquid to escape; and
- Seal any test boots or secondary piping termination fittings to prevent hydrostatic test liquid from entering the piping interstice.

Hydrostatic testing of spill prevention equipment and containment sumps must be conducted by a DEP-certified individual holding valid UMX, UMI, UTT, or IUM certification (See 25 Pa. Code §§ 245.110(b) and 245.112(b)). All testing must be conducted in accordance with the equipment manufacturer's specifications or a code of practice developed by a Nationally-recognized association or independent testing laboratory (See 25 Pa. Code § 245.421(b)(4)).

Document the results of spill prevention equipment and containment sump testing on the Department's "Underground Storage Tank Spill Prevention Equipment/Containment Sump Integrity Testing Form" (2630-FM-BECB####). The UST system owner should maintain documentation of proper management of waste hydrostatic test liquid with Form 2630-FM-BECB####, in accordance with Section VIII, below.

## IV. TEST LIQUID REUSE

After the completion of hydrostatic testing at a UST facility, hydrostatic test liquid that cannot be or will not be reused is considered a solid waste, and must be managed in accordance with all applicable laws and regulations. The Department strongly recommends using clean hydrostatic test liquid for each testing event at different UST facilities.

The Department recommends that testers only reuse hydrostatic test liquid for hydrostatic testing at additional UST facilities if all of the following conditions are met:

- The test liquid was used to test newly installed, unused equipment;
- The test liquid does not exhibit a visible sheen; and
- The test liquid has not come into contact with a regulated substance.

Hydrostatic test liquid that is clean enough to be considered a suitable substitute for unused hydrostatic test fluid and is intended to be reused for hydrostatic testing at additional UST facilities may be excluded from the definition of a waste in 25 Pa. Code § 287.1. Used hydrostatic test liquid intended for reuse may be stored by the testing company, provided at least 75% of the accumulated test liquid is reused within 12 months of its initial storage.

Testing companies that intend to reuse hydrostatic test liquid at additional UST facilities should receive the consent of the UST facility owner prior to placing reused hydrostatic test liquid into equipment at those facilities.

Hydrostatic test liquid that was used to test existing equipment that has contained or may have contained a regulated substance or residue:

- May be reused for additional testing at the same UST facility if it does not exhibit a visible sheen.
- Should be designated as a hazardous waste or residual waste and properly managed, including disposal, when hydrostatic testing is complete at the UST facility.

## V. WASTE DETERMINATION

Used hydrostatic test liquids that are not suitable for reuse or will not be reused are solid wastes as defined in the SWMA, and may be hazardous wastes. After the completion of hydrostatic testing at a UST facility, and before waste hydrostatic test liquid may be transported, a hazardous waste determination must be made in accordance with 40 CFR § 262.11 (*relating to hazardous waste determination and recordkeeping*).

Waste hydrostatic test liquids mixed with a petroleum product may exhibit hazardous waste characteristics for ignitability or toxicity. Benzene is the most likely constituent in modern petroleum products that could cause hydrostatic test liquid to exhibit the toxicity characteristics of a hazardous waste. Waste hydrostatic test liquid is a hazardous waste if it exhibits any of the hazardous waste characteristics in 40 CFR 261, Subpart C. All wastes should be managed as hazardous waste until it is determined that they are not hazardous.

If waste hydrostatic test liquid is determined to be a hazardous waste, it must be managed in accordance with 25 Pa. Code, Chapters 260a-270a (*relating to hazardous waste management*).

Generators of hazardous waste in excess of 220 lbs. in any given month should obtain a generator ID number by submitting EPA form 8700-12 "Notification of RCRA Subtitle C Activity" to DEP's Bureau of Waste Management, Hazardous Waste Management Division (See 25 Pa. Code §§ 260a-269a). Companies that conduct hydrostatic testing of UST system equipment may utilize their generator ID number, provided they accept responsibility for the proper management of the hazardous waste.

If waste hydrostatic test liquid is determined to be non-hazardous, it should be managed as residual waste. Residual wastes must be managed in accordance with 25 Pa. Code, Chapters 287-299 (*relating to residual waste management*).

If it is unknown whether waste hydrostatic test liquid is hazardous, it should be treated as a hazardous waste until it is determined to be non-hazardous.

Hydrostatic test liquid that has only been used for hydrostatic testing at one UST facility, meets the conditions for reuse, above, and will not be reused, may be considered a residual waste by knowledge of the origin of the waste and the process used to generate the waste.

## VI. WASTE MANAGEMENT

The Department has authority under the SWMA to regulate the storage, collection, transportation, processing, treatment, and disposal of waste in Pennsylvania. There are separate regulations for the management of hazardous waste and residual waste.

To minimize the amount of hazardous waste generated during hydrostatic testing, and the associated cost of hazardous waste disposal, the Department recommends segregating liquid used to test equipment associated with UST systems containing hazardous substances and gasoline from liquid used to test components of UST systems containing other regulated substances. Waste hydrostatic test liquid designated as a hazardous waste should not be mixed with non-hazardous wastes. Dilution of hazardous waste hydrostatic test liquid may constitute treatment, as defined in the SWMA. Treatment of hazardous wastes must be conducted by a properly permitted hazardous waste treatment facility.

Waste hydrostatic test liquid must be managed, according to its waste designation, pursuant to the SWMA, the Waste Transportation Safety Act, and all applicable regulations. Management of wastes includes, but is not limited to: proper storage, collection, transportation, processing, treatment and disposal.

### A. Generator Responsibilities

The generator of hazardous waste and residual waste, as defined in 25 Pa. Code Chapters 260a-270a and 25 Pa. Code Chapters 287-299 is responsible for ensuring that the waste is managed in compliance with all applicable laws and regulations.

Where more than one party's actions contribute to the generation of a waste, all parties, including the UST system owner and the testing company, are considered co-generators. All co-generators are responsible for ensuring that the waste is properly designated and managed in accordance with the SWMA and all applicable regulations. It may be advisable for co-generators to prepare a contract specifying which party is responsible for the proper management of waste hydrostatic testing liquid.

### B. Managing Hazardous Waste

Hazardous Waste must be managed in accordance with the SWMA, 40 CFR Part 263, and applicable sections of 25 Pa. Code Chapters 260a-270a. Hazardous waste must be transported by a licensed hazardous waste hauler.

### C. Managing Residual Waste

Residual Waste must be managed in accordance with the SWMA, the Waste Transportation Safety Act and applicable sections of 25 Pa. Code Chapters 287-299.

The Pennsylvania Department of Transportation and the Public Utilities Commission may have additional requirements regarding management and transportation of solid wastes in Pennsylvania.

## **VII. WASTE DISPOSAL**

Hazardous waste and residual waste must be disposed of in compliance with the SWMA and all applicable regulations.

Hydrostatic test liquid may be disposed of using the following methods:

1. Hydrostatic test liquid that meets the Department's recommendations for reuse in Section IV., above, may be reused.
2. Hydrostatic test liquid that has only been used for hydrostatic testing at one UST facility, meets the Department's recommendations for reuse in Section IV., above, and will not be reused may be disposed of as a residual waste.
3. Hydrostatic test liquid containing oily residue may be deposited into an oil-water separator at the facility at which the testing was conducted, if all of the following conditions are met:
  - The oil-water separator is properly permitted by the authority having jurisdiction;
  - Placement of the hydrostatic test liquid into the oil-water separator will not cause discharges to exceed the conditions of the applicable permit;
  - The hydrostatic test liquid has not been treated with a solvent, soap, or any substance that causes the oily residue to become miscible in water; and
  - Both the oil and water fractions are disposed of in accordance with applicable regulations. A waste determination should be made prior to disposal of the substance(s) from the oil-water separator system. Any discharge to waters of the Commonwealth, including storm drains, will require approved National Pollutant Discharge Elimination System (NPDES) permit coverage from DEP.
4. Waste hydrostatic test liquid that is to be disposed of must be properly designated as a hazardous or residual waste, and managed in accordance with its designation. The generator of waste hydrostatic test liquid must determine if that waste is a hazardous or residual waste and ensure that it is managed and disposed of in accordance with the provisions of the SWMA and all applicable regulations.

Hazardous waste must be disposed of at a permitted hazardous waste processing, treatment, storage or disposal facility. Residual waste must be disposed of at a facility that is properly permitted, and is equipped to process, treat, store or dispose of the residual waste. If residual waste is disposed of at a publicly owned treatment works (POTW), prior approval must be given by the POTW.

## **VIII. RECORDKEEPING**

Proper management and disposal of waste hydrostatic test liquids must be documented, and the generator of the waste must maintain the documentation. The required documentation for the management and disposal of hazardous waste can be found at 40 CFR 262, Subpart B incorporated by reference in 25 Pa. Code Chapter 262a (*relating to standards applicable to*



*generators of hazardous waste*). The required documentation for the management and disposal of residual waste can be found at 25 Pa. Code § 287.55 (*relating to retained recordkeeping*).

In addition to the recordkeeping requirements described above, the testing company should include the following documentation with the results of hydrostatic testing reported on the “Underground Storage Tank Spill Prevention Equipment/Containment Sump Integrity Testing Form” (2630-FM-BECB####) and the UST system owner should maintain the form and associated documentation:

1. Hydrostatic test liquid to be reused – Statement that the hydrostatic test liquid is a suitable substitute for unused hydrostatic test liquid, it has not come into contact with a regulated substance, and it will be reused.
2. Waste hydrostatic test liquid designated as hazardous waste – Hazardous waste generator ID number, licensed hazardous waste transporter name and ID number, ID number of the permitted hazardous waste processing, treatment, storage or disposal facility.
3. Waste hydrostatic test liquid designated as residual waste – Name, address and telephone number of the company that transported the waste, and the processing or disposal facility or other destination (including POTW) to which the waste was transported.
4. Waste hydrostatic test liquid deposited into the facility’s oil-water separator – Description of the substance deposited, date deposited, and volume deposited.

Waste hydrostatic test liquid deposited into the facility’s oil-water separator does not need to be designated as hazardous or non-hazardous until the contents of the oil-water separator are to be disposed of. In addition to the recordkeeping requirements for testing companies and facility owners in Paragraph 4, above, the facility owner must make a hazardous waste determination in accordance with 40 CFR Part 262.11 upon disposal of the contents of the oil-water separator. If the waste is determined to be a hazardous waste, the facility owner should attach the documentation for waste hydrostatic test liquid designated as hazardous waste (Paragraph 2, above) to their copy of the “Underground Storage Tank Spill Prevention Equipment/Containment Sump Integrity Testing Form” (2630-FM-BECB#####). If the waste is determined to be non-hazardous, the facility owner should attach the documentation for waste hydrostatic test liquid designated as residual waste (Paragraph 3, above) to their copy of Form 2630-FM-BECB#####.

## IX. RESOURCES

Other options for managing and disposing of waste hydrostatic test liquids may be available. For additional information regarding the designation, storage, transport, and disposal of waste hydrostatic test liquids, please contact DEP's Waste Management Program at the regional office responsible for the county in which the facility is located.

For information regarding the designation, storage, transport, and disposal of residual waste, contact DEP's Bureau of Waste Management, Residual Waste Division at (717)787-7381.

For information regarding the designation, storage, transport, and disposal of hazardous waste, contact DEP's Bureau of Waste Management, Hazardous Waste Management Division at (717)787-6239.

For information regarding NPDES permits and discharges to waters of the Commonwealth, including storm drains, contact DEP's Clean Water Program at the regional office responsible for the county in which the facility is located or central office at (717)787-8184.

For information regarding hydrostatic testing requirements under the Storage Tank Regulations, contact DEP's Division of Storage Tanks at 1-800-42TANKS (Toll free in PA) or (717)772-5599.

<b>Storage Tanks Program Regional Contacts</b>	
<p><b>Southeast Region</b>                      2 East Main St.                      Norristown, PA 19401-4915                      484-250-5900  <b>Counties:</b> Bucks, Chester, Delaware, Montgomery and Philadelphia</p>	<p><b>Northeast Region</b>                      2 Public Square                      Wilkes-Barre, PA 18701-1915                      570-826-2511  <b>Counties:</b> Carbon, Lackawanna, Lehigh, Luzerne, Monroe, Northampton, Pike, Schuylkill, Susquehanna, Wayne and Wyoming</p>
<p><b>South-central Region</b>                      909 Elmerton Ave.                      Harrisburg, PA 17110-8200                      717-705-4705  <b>Counties:</b> Adams, Bedford, Berks, Blair, Cumberland, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lancaster, Lebanon, Mifflin, Perry and York</p>	<p><b>North-central Region</b>                      208 West Third St., Ste. 101                      Williamsport, PA 17701-6448                      570-321-6525  <b>Counties:</b> Bradford, Cameron, Centre, Clearfield, Clinton, Columbia, Lycoming, Montour, Northumberland, Potter, Snyder, Sullivan, Tioga and Union</p>
<p><b>Southwest Region</b>                      400 Waterfront Drive                      Pittsburgh, PA 15222-4745                      412-442-4000  <b>Counties:</b> Allegheny, Armstrong, Beaver, Cambria, Fayette, Greene, Indiana, Somerset, Washington and Westmoreland</p>	<p><b>Northwest Region</b>                      230 Chestnut St.                      Meadville, PA 16335-3481                      814-332-6648  <b>Counties:</b> Butler, Clarion, Crawford, Elk, Erie, Forest, Jefferson, Lawrence, McKean, Mercer, Venango and Warren</p>