

HAZARDOUS MATERIALS PROGRAM ENVIRONMENTAL FACT SHEET

Managing Hazardous Waste from Hydrostatic Testing at Underground Storage Tank (UST) Facilities

Facilities that store gasoline, diesel, kerosene, or other petroleum products or hazardous materials in underground storage tanks (USTs) must operate in compliance with the [Vermont UST Rules](#). In addition to these rules, UST facilities that generate hazardous waste must comply with the [Vermont Hazardous Waste Management Regulations \(VHWMR\)](#). This fact sheet is intended to assist UST owners/operators with managing waste that is generated through conducting hydrostatic testing of containment equipment. Examples of containment equipment include fill port spill containment (spill buckets), containment sumps with pressurized piping, and under dispenser/pump piping sumps (dispenser sumps). For simplicity, the term “sump” is used throughout this fact sheet. This guidance also applies to managing waste in instances of liquid intrusion into UST components that are designed to be liquid tight (e.g., rain or snow entering a spill bucket).

Background

Federal regulations require all regulated UST facilities to conduct tightness testing of sumps every three years. The purpose of tightness testing is to ensure that sumps are functioning as designed to prevent releases to the environment. Hydrostatic testing is by far the most common method for conducting tightness testing of UST sumps in Vermont. Less common are vacuum testing, pressure testing, and other testing methods conducted in accordance with the Petroleum Equipment Institute’s RP 1200: Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities. Hydrostatic testing may involve the generation of hazardous waste, while other test methods typically do not.

What is hydrostatic testing?

Hydrostatic testing involves removing liquid and debris from the sump, filling the sump with liquid and allowing it to stabilize, marking the precise level of the liquid level on the side of the sump, and finally monitoring the liquid level for at least one hour. If the liquid remains at the same level, the sump passes the tightness test. If the liquid level drops 1/8th of an inch or more, the sump fails the test.

What does hydrostatic testing have to do with hazardous waste?

Through normal operation of a UST system, sumps may come into contact with the material stored in the UST system (e.g., petroleum product, hazardous material). If a sump is contaminated, hazardous waste *may* be generated when conducting a hydrostatic test. However, this depends on the type and amount of contamination in the sump that is being tested.

Note: The release of hazardous materials (including materials that contain petroleum) into the surface

or groundwater, or onto the land of the state, is prohibited under § 7-302 of the VHWMR. This means that waste liquids from a hydrostatic test may not be poured onto the ground.

What types of hazardous waste might be generated through hydrostatic testing?

A description of VHWMR hazardous waste codes commonly associated with petroleum are listed below, along with examples of the types of wastes that *might* be generated through hydrostatic testing. Please note that the descriptions of waste codes provided here are a summary; refer to the VHWMR for complete listings.

Common Petroleum-Related Hazardous Waste Codes

D001 – waste ignitable solids; waste ignitable liquids with a flash point less than 140 °F.

D018 – waste with a concentration of 0.5mg/L or greater of benzene.

VT02 – waste containing greater than 5% by weight of petroleum distillates.

Example Hazardous Waste – Solids

If rags, pads, granular absorbents, or other absorbent materials are used to clean and dry a sump prior to hydrostatic testing, this waste will contain whatever contaminants were present in the sump when the waste is being disposed of. Depending on the type and amount of contamination, this waste *may* be regulated as hazardous waste with the following waste code(s): D001, D018, VT02 (see below).

Example Hazardous Waste – Liquids

Sumps are filled with liquid in order to conduct a hydrostatic test. This liquid will mix with whatever contaminants were present in the sump when the test was conducted. Depending on the type and amount of contamination, this waste *may* be regulated as hazardous waste with the following waste code(s): D001, D018, VT02 (see below).

How do I know whether I am generating hazardous waste through hydrostatic testing?

The generator of the waste (i.e., the UST facility conducting the hydrostatic test) is responsible for accurately determining whether their waste is hazardous. This may be determined based on the generator's knowledge of the materials and process that generates the waste, or through having a third party test the waste. For example, if a sheen and odor associated with petroleum is observed in the sump being tested, then it is likely that the waste generated through hydrostatic testing is hazardous. If the generator is not certain whether waste liquid from sump testing is hazardous, they may either manage it as hazardous waste or have it tested prior to deciding on an approach to waste management.

How do I manage and dispose of hazardous waste?

UST facilities should note that there are specific requirements that generators must follow regarding hazardous waste containers, storage, transport, and destinations for disposal. Refer to the "Resources" section at the end of this fact sheet for more information.

May wastes generated through hydrostatic testing be sent offsite for energy recovery?

It depends. Fuels are exempt from regulation as hazardous waste, provided that they are burned for energy recovery and the generator adheres to the management standards in § 7-204(l) of the VHWMR. For example, a generator may manage liquid waste that is generated through hydrostatic testing according to the “fuel-to-fuel” exemption if the material contains a recoverable portion of fuel (e.g., gasoline or diesel is present to the extent that there is visible phase separation), is managed appropriately while stored onsite, and the generator works with an entity that uses the material for energy recovery. Notably, containers must be in good condition, kept closed, stored on an impervious surface, marked to identify that the contents are a usable fuel product, protected from freezing, and within a structure that sheds rain and snow (if stored out-of-doors). The generator must also maintain documentation regarding the amount of material and the receiving facility. If you have questions about the fuel-to-fuel exemption, contact the Hazardous Materials Section using the information at the end of this fact sheet.

Resources

Most UST facilities that generate hazardous waste are regulated as very small quantity generators (VSQGs) according to the Vermont Hazardous Waste Management Regulations (VHWMR). Refer to the [VSQG Guidebook](#) for an overview of the basic requirements that apply to VSQGs. This guidebook is also intended to assist generators with making hazardous waste determinations. If you have questions about the requirements of the VHWMR, please contact the Vermont Department of Environmental Conservation (DEC) Hazardous Waste Section using the information at the end of this fact sheet.

UST facilities that handle hazardous materials (e.g., hazardous waste, petroleum products) may need to respond to and report a release (spill) to the environment. Refer to the [Hazardous Material Spill Response Fact Sheet](#) for an overview of the requirements that must be followed in the event of a spill.

To access compliance assistance resources regarding the Vermont UST Rules, including testing forms, templates for conducting walk-through inspections, and guidance for compliance inspections, refer to the [Keeping Your UST Facility in Compliance webpage](#). If you have questions about the UST Rules, please contact the DEC Storage Tanks Section using the information at the bottom of the webpage.

For more information regarding managing hazardous waste at UST facilities, or if you have other hazardous waste management questions, please contact:

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