



FAQs: Management of Test Fluid from Underground Storage Tank Equipment

Hydrostatic testing may expose test fluid to hazardous waste materials from uncleaned spill buckets and containment sumps. Petroleum and other regulated substances can contaminate the test fluid and cause it to be regulated as a hazardous waste and require specific means of disposal. To minimize test fluid contamination, liquid or debris found in the spill bucket or containment sump must be carefully removed and properly disposed of before testing. Fuel, rags, absorbents, water, and other materials used in the test may also need to be managed and disposed of as a hazardous waste.

What are the requirements for managing the test fluid?

The underground storage tank (UST) facility owner or operator must determine how to properly dispose of used test fluid (waste). In order to dispose of the waste properly, they must first determine if it is a hazardous waste pursuant to IDAPA 58.01.05.006 (40 CFR §262.11). This determination is made by characterizing the waste through laboratory analysis. If the waste is nonhazardous, further characterization may be necessary to determine disposal options. The following are potential management requirements based on the waste determination:

- **The test fluid is hazardous waste.** It may be disposed of at a hazardous waste facility or reclaimed. Retain documentation of waste analysis and disposal or reclamation.
- **The test fluid is nonhazardous waste but shows levels of contaminants above residential use screening levels.** It may be disposed of at a hazardous waste facility, reclaimed, disposed of via an approved oil-water separator or waste water treatment facility with prior approval, or a local landfill may take it if their acceptance criteria are met. Retain documentation of waste analysis and disposal or reclamation.
- **The test fluid is nonhazardous and levels of contaminants are below residential use screening levels.** Choose a disposal option, including but not limited to those described above. Retain documentation of waste analysis and disposal option.

How do I determine if the test fluid is a hazardous waste?

Test fluid is considered hazardous unless a laboratory analysis demonstrates it is nonhazardous. Most test fluid will require laboratory analysis because petroleum contaminants in very small amounts can make the fluid hazardous. Another option is to designate the test fluid as a hazardous waste and dispose of it as such instead of going through laboratory analysis.

If analyzed, test fluid that has come into contact with petroleum residues is most likely hazardous for *toxicity* and/or *ignitability*.

- The most likely contaminant to analyze for *toxicity* is benzene. The relevant tests for benzene are EPA Method 1311/8260, 1311/8015, or 1311/5030/8021. If benzene is present at a concentration greater than 0.5 mg/L, the waste is considered hazardous.
- A flash point analysis using EPA Method 1010A or 1020B will determine if the waste is hazardous for *ignitability*. If the flash point is below 140°F, the waste is considered hazardous.

While these are the most common analyses, other contaminants must be tested for if there is reason to suspect contaminants other than petroleum may be present. For example, some USTs contain regulated hazardous substances such as pesticides. A hazardous waste disposal facility may want a more comprehensive analysis of the waste before acceptance. In such cases, contact vendors before sampling to ensure that all appropriate analyses are considered. While awaiting characterization results, containers holding used test fluid must be labeled “Test Fluid Pending Analysis.”

What are the requirements for managing hazardous fluid?

If the test fluid is considered hazardous, the following management options are available:

- Ship the fluid as a hazardous waste using a hazardous waste transporter to a permitted hazardous waste treatment, storage, and disposal facility (TSDF) for disposal. Ensure the waste transporter has an EPA Identification Number.
- Ship the test fluid to be reclaimed (e.g., fuel blending) by an approved facility.

Prior to disposal, hazardous waste container management requirements may apply, depending on the quantity generated. Contact one of the DEQ offices at the end of this document or find more information on hazardous waste management on DEQ’s website:

<https://www.deq.idaho.gov/waste-mgmt-remediation/hazardous-waste/>.

What are the requirements for managing nonhazardous fluid?

If the waste is not considered hazardous, it does not necessarily mean it is free from all contaminants. Further analysis using EPA Method 8260/8270 may be required to determine disposal options for nonhazardous wastes.

If the test fluid contains any contaminants equal to or greater than that contaminant’s Residential Use Screening Level (RUSL), the following options are available:

- Ship the fluid as a hazardous waste using a hazardous waste transporter to a permitted hazardous waste treatment, storage, and disposal facility (TSDF) for disposal. Ensure the waste transporter has an EPA Identification Number.
- Ship the test fluid as industrial wastewater to a wastewater treatment plant that is permitted to accept such wastes.
- Ship the test fluid to be reclaimed (e.g., fuel blending) by an approved facility.
- Discharge the test fluid through the sewer system to a publically-owned treatment works (POTW) for treatment and disposal. The POTW must agree to accept the waste prior to

discharge and all Clean Water Act pretreatment regulations must be met.

- With approval, discharge the test fluid through an oil-water separator.
- A local landfill may take it if their acceptance criteria are met. Liquids must be solidified prior to landfilling and not all landfills will accept this type of solidified waste.

A complete list of RUSLs can be found in Table 2 of the Idaho Risk Evaluation Manual for Petroleum Releases (<http://www.deq.idaho.gov/media/60181992/idaho-risk-evaluation-manual-for-petroleum-releases-2018.pdf>).

To save time and money, test fluid can be analyzed for hazardous waste and RUSLs at the same time.

What are the requirements for managing test fluid that is nonhazardous and below all RUSLs?

If the test fluid does not contain any contaminants equal to or greater than the respective RUSL, the test fluid is unregulated and there are no disposal requirements. However, discharging this type of test fluid to the soil repeatedly in the same location over time could result in a build-up of contaminants, which may eventually necessitate cleanup of a hazardous waste. DEQ highly recommends managing the test fluid by one of the methods described above.

Can test fluid be reused for multiple hydrostatic tests?

Reusing test fluid is discouraged for the following reasons:

- Reusing the test fluid increases the potential to manage it as a hazardous waste once it is ready to be disposed.
- If the reused and contaminated test fluid leaks from the spill bucket or containment sump during the test (i.e., the test fails due to a crack or hole), the environment may now be contaminated and DEQ may require a site assessment and cleanup.

If a UST facility is contracting with a testing company, DEQ strongly recommends that the UST facility use new, clean testing fluid and clarify who will be responsible for proper disposal of the fluid.

Test fluid is not considered a waste until it is ready to be disposed of and can be reused for multiple hydrostatic tests. However, this is discouraged and DEQ recommends using new test fluid for each test.

Are there alternatives to hydrostatic testing?

Yes. The following alternatives to hydrostatic testing do not generate test fluid:

- Vacuum testing
- Double-walled spill bucket and containment sump installation and monitoring of interstitial space during monthly walkthrough inspections

For additional information, contact

DEQ State Office

Waste Management and Remediation Division
1410 N. Hilton
Boise, ID 83706
(208) 373-0502

DEQ Boise Regional Office

1445 N. Orchard St.
Boise, ID 83706
(208) 373-0550
toll-free: (888) 800-3480

DEQ Lewiston Regional Office

1118 F St.
Lewiston, ID 83501
(208) 799-4370
toll-free: (877) 541-3304

DEQ Coeur d'Alene Reg. Office

2110 Ironwood Parkway
Coeur d'Alene, ID 83814
(208) 769-1422
toll-free: (877) 370-0017

DEQ Pocatello Regional Office

444 Hospital Way, #300
Pocatello, ID 83201
(208) 236-6160
toll-free: (888) 655-6160

DEQ Idaho Falls Regional Office

900 N. Skyline Drive, Suite B
Idaho Falls, ID 83402
(208) 528-2650
toll-free: (800) 232-4635

DEQ Twin Falls Regional Office

650 Addison Ave. W., Suite 110
Twin Falls, ID 83301
(208) 736-2190
toll-free: (800) 270-1663