



Idaho Department of  
Environmental Quality  
[www.deq.idaho.gov](http://www.deq.idaho.gov)

## FAQs: Management of Test Fluid from Underground Storage Tank (UST) Equipment

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There are potential hazardous waste issues related to managing test fluid from hydrostatically testing spill buckets and containment sumps. Residue in spill buckets and containment sumps can cause the test fluid to be regulated as a hazardous waste.

### **How do I determine if the hydrostatic test fluid from testing an UST facility's spill buckets and containment sumps is a hazardous waste or nonhazardous waste?**

The UST facility owner or operator is responsible for determining if the test fluid is a hazardous waste pursuant to IDAPA 58.01.05.006 (40 CFR §262.11). This determination must be made either by characterizing the fluid or by applying knowledge of the hazardous characteristics of the spent fluid based on materials or processes used at the UST facility.

If applying knowledge, the generator (i.e., the facility owner, operator, or the contractor conducting the hydrostatic tests of the spill buckets or containment sumps) must document the determination.

If characterizing, the generator must send a sample of the test fluid to a laboratory for analysis of ignitability and toxicity characteristic leaching procedure (TCLP) analytes. Test fluid mixed with a petroleum product is considered hazardous if the mixture is ignitable (i.e., it has a flashpoint that is lower than 140 °F) and/or is toxic (i.e., the mixture fails the TCLP per 40 CFR §261.24). Benzene is the constituent most likely to cause test fluid to fail the TCLP. While awaiting characterization results, containers holding used test fluid should be labeled "Test Fluid Pending Analysis." Contact one of the DEQ offices below for more information.

### **What are the requirements for managing hazardous fluid?**

If the fluid is a gasoline-water mixture, it will be regulated as a hazardous waste unless it can be shown to be nonhazardous based on characterization or generator knowledge. If it is determined that the fluid is hazardous, the generator has several management options and may do the following:

- Send the gasoline-water mixture to be reclaimed. Recovered commercial chemical products normally used as fuels (e.g., gasoline) are not regulated as hazardous waste if they are used as an ingredient to make a fuel (e.g., fuel blending). The hazardous waste regulations also would not apply if the free product is sent to a refinery for re-refining or combined directly with other gasoline for resale (with or without processing).
- Ship the fluid as a hazardous waste using a hazardous waste transporter (who has obtained an EPA identification number) to a permitted hazardous waste treatment, storage, and disposal facility (TSDF) for disposal.

- Discharge the test fluid through the sewer system to a publicly owned treatment works (POTW) for treatment and disposal, provided the POTW agrees to accept the waste and all applicable Clean Water Act pretreatment regulations are met. The local sewer authority may not grant approval due to the potential for sewer system explosions.

Prior to disposal, hazardous waste container management requirements may apply, depending on the quantity generated. Contact one of the DEQ offices below for more information.

### **What are the requirements for managing nonhazardous fluid?**

A nonhazardous characterization does not necessarily mean the test fluid is free from contaminants. The test fluid may still contain contaminants that must be properly managed.

If the test fluid contains any contaminants equal to or greater than the respective maximum contaminant level (e.g. 0.005 mg/L benzene), a generator of nonhazardous fluid may do the following:

- Send the gasoline-water mixture to be reclaimed (e.g., fuel blending).
- Ship the fluid as an industrial wastewater to a wastewater treatment plant that is permitted to accept such wastes.
- Ship the fluid as an industrial wastewater to a solid waste facility for solidification and landfill disposal.
- Discharge the fluid through an oil-water separator or to the sewer system to a POTW for treatment and disposal, provided the POTW agrees to accept the waste and all applicable Clean Water Act pretreatment regulations are met. The local sewer authority may not grant approval due to the potential for sewer system explosions.

If the test fluid does not contain any contaminants equal to or greater than the respective maximum contaminant level, 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, potentially causing the soil to characterize as a hazardous waste.

### **Can test fluid be reused for multiple hydrostatic tests?**

Yes, but this is not recommended. Test fluid used for hydrostatic testing of spill buckets and containment sumps can be used for multiple tests. The test fluid is not considered a waste until it is ready to be discarded.

To minimize test fluid contamination, spill buckets and containment sumps should be inspected and cleaned of all material containing petroleum and/or other regulated substances before starting a test. If liquid or debris is found in the spill bucket or containment sump, it should be carefully removed and properly disposed of. During the hydrostatic test, the test fluid may be contaminated by materials remaining in an uncleaned spill bucket or containment sump. Fuel, rags, absorbents, water, and other materials used in the test may need to be managed and disposed of as hazardous waste. Reusing the test fluid increases the potential need to manage it as a hazardous waste once it is ready to be discarded. Additionally, if the test fluid leaks from the spill bucket or containment sump during the test (i.e., the test fails due to a crack or hole), or if it is otherwise disposed of to the environment, the generator must take all appropriate measures to

address the release. Due to the potential for contaminants to be introduced into the environment from a test fluid release, DEQ may require a site assessment and cleanup. Therefore, DEQ recommends using new test fluid for each test.

If an UST facility is contracting with a testing company, DEQ strongly recommends that the UST facility ask the testing company whether they will use new or reused testing fluid and clarify who will be responsible for proper disposal of the fluid when it needs to be discarded. Once test fluid is ready to be discarded, the generator of the test fluid must follow the steps described in this sheet to determine if it is hazardous or nonhazardous.

Hydrostatic test fluid may not be disposed in storm drains, surface water, or on land.

**Are there alternatives to hydrostatic testing?**

Yes. The alternatives to hydrostatic testing listed below 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