

Management of Solvent Tanks

Environmental Management Bulletin

7 August 2014

This bulletin provides guidance on the proper management of solvent tanks. Solvent tanks are used extensively by organizations on Fort Leonard Wood (FLW) for cleaning weapons and automotive parts. The use of these machines presents certain hazards to the environment if not managed properly. Conversely, if managed properly, the probability of an environmental impact from such hazards will be greatly reduced. The following guidelines must be followed by all military and civilian personnel using solvent tanks on FLW. If there are any questions or comments, contact the Hazardous Waste Program Manager at the DPW Environmental Branch at 573-596-0882.

Regulations

Solvent tanks are regulated by the Environmental Protection Agency (EPA), the state of Missouri, and the Department of the Army. Waste solvent handling and disposal is regulated by the Resource Conservation and Recovery Act, while the amount of solvent used and the total quantity of solvent stored on the installation is regulated by the Clean Air Act, Emergency Planning and Community Right to Know Act (EPCRA), and Army Regulation 200-1.

FLW Guidelines

1. Organizational Standard Operating Procedure (SOP)

a. Organizations will establish SOPs to manage their used filters and solvent in a manner to prevent improper handling and disposal. It is recommended that the Environmental Compliance Officer (ECO) prepare and maintain the organization's SOP. The SOP must be posted near the areas in which the solvent tanks will be used. The DPW Environmental Branch is available to assist with SOP preparation upon request. The SOP will be evaluated for compliance during the Environmental Organizational Inspection Program. The following items are required to be included and implemented in the SOP:

- (1) Spill Prevention and Response Procedures.
- (2) The name and contact information of the contractor or organization that is responsible for maintaining the solvent tank.
- (3) A tracking log must be maintained for visits made by the service representative and servicing of the solvent tank.
- (4) A tracking log must be maintained with the frequency of when filters and solvents are changed and when they are turned in to the Defense Reutilization Marketing Office (DRMO) Hazardous Waste Disposal Contractor.
- (5) If the organization is storing extra solvent tanks that are not in use or extra solvent, then records must be maintained to include what, where, and how much is being stored.

2. Solvent Tank Management

a. Only solvents with a flash point greater than 145° F/ 62.78°C is allowed for use. Generally, these types of solvents must be specifically requested from the vendor. Solvents with a flash point equal to or less than 145° F/ 62.78°C is not allowed. Solvents must be virgin, heavy hydro-treated aliphatic petroleum distillate, and shall not contain traces of the compounds found on the "F" list provided by the EPA. A list of these compounds can be found on the EPA's [website](#). It is important to maintain compliance. The following steps will better assist the owners of solvent tanks:

- (1) Ensure that the secondary containment is properly managed and will confine any spills.

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- (2) On a routine basis, visually inspect the solvent tank for any form of leaking from the tank or the secondary containment area.
- (3) Ensure the lid to the solvent tank is closed at all times except when in use.
- (4) Ensure there are no signs of rust on the container (if signs of rust do exist, notify the solvent tank service representative to correct the problem).
- (5) The following items will be maintained within close proximity of the solvent tank at all times:
 - (a) The FLW Spill Prevention and Response Plan (SPRP)
 - (b) A complete spill kit along with a fully functional Class ABC Fire Extinguisher (if spill kit is not complete a list of missing parts on order will be maintained).
 - (c) A list of contact numbers to include:
 - I. Fire Department, 911
 - II. Environmental Branch, 573-596-0882
 - III. Organization's ECO
 - (d) Solvents will be transported in Department of Transportation approved containers.
 - (e) Transportation of all solvents will be provided by DRMO Hazardous Waste Disposal Contractor at 573-329-8532.

3. Spill Procedures

- a. In the event of a solvent spill (of any volume), the following steps will be taken IMMEDIATELY:
 - (1) Eliminate all sources of ignition in the room.
 - (2) Stop the leak if this can be done without risk to health or life.
 - (3) Report all spills immediately to the Fire Department by dialing 911.
 - (4) Contact both the DPW Environmental Branch at 573-596-0882 and the Organization's ECO, only do so after the Fire Department has been notified.
 - (5) The organization is responsible for cleanup, removal, and disposal of the recovered pollutants with guidance from the FLW Environmental Branch.
 - (6) Within three (3) days, a spill report form must be submitted to the FLW Environmental Branch.

4. Turn-in Procedures

- a. Solvent tanks equipped with replaceable filters must have the waste filters tested prior to disposal. Contact the DPW Environmental Branch for testing and disposal procedures. All documentation associated with turning in waste filters will be performed by the owner and maintained with the completed Solvent Tank User Weekly Inspection Checklist.
- b. Use solvent for its intended purposes only. Solvents should not be removed from the tank, except for proper disposal or during turn in. All solvent that has been turned in for disposal must be tracked by the owner and records must be maintained for the weekly inspections conducted by the owner.
- c. Solvents no longer usable for cleaning must be turned in to DRMO Hazardous Waste Disposal Contractor. The DPW Hazardous Waste Turn in Procedures must be followed. These procedures are found on the DPW Environmental Branch [website](#).

5. Required Reporting

- a. To comply with the requirements of the Federal Emissions Inventory Questionnaire, each month solvent volumes will be recorded during unit inspection to include:
 - (1) The location of the solvent tank.

(2) Type of solvent.

(3) The amount of solvent added (in gallons) or a “not applicable” response if none was added during the month.

b. The unit/organization is responsible for tracking total volume of solvent used annually. This information is required to prepare the annual EPCRA report for the installation.

6. Assistance Visits

a. Internal inspections will be conducted by the owner of the solvent tank on a weekly basis. The owner of the solvent tank must use the inspection form, Solvent Tank User Weekly Inspection Checklist, which can be found on the DPW Environmental Branch [website](#). This checklist must be completed and maintained on site for a period of no less than 36 months.

b. External assistance visits will be conducted quarterly by the DPW Environmental Branch. These assistance visits will ensure proper compliance with all Federal, State, Local, and Army regulations. If compliance is not maintained by the organization, the solvent tank location will be visited monthly until compliance is achieved.

c. For any questions pertaining to solvent tank management, assistance visits, or this bulletin, contact the DPW Environmental Branch Hazardous Waste Program Manager at 573-596-0882.