

UST Basics and Compliance Issues

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Oneida's Compliance Assistance Program

Goals

UST Program Overview

Regulations

Equipment Basics

Demonstration of compliance

Jurisdictional Issues



562,751 Active

* According EPA OUST Mid-year 2016 Report

2,526 Indian Country Active

* According EPA OUST Mid-year 2016 Report

436 million gallons per day

Federal Requirements

- ALL Indian Country facilities must meet the requirement for Operator and equipment upgrades training by October 13, 2018
 - Designation of operators
 - Leak requirements
 - Record keeping

General Requirements

- Inspect
- Respond
- Maintain
- Test
- Keep Records
- Financial Responsibility



Owner Operator Classification

Class A Operator	Class B Operator	Class C Operator
Primary responsibility for on-site operation & maintenance	Daily operation & maintenance responsibility	Daily frontline employees (cashiers), responsibility for addressing emergencies, spills or releases
 Permits Ensuring contractors are competent Ensure UST rules complied with Identifying and ensuring B & C operators are trained and competent Financial assurance 	 Daily inventory Monthly release detection Regulatory Compliance Equipment inspections Record maintenance ATG Certifications Repairs Registration Inspection 	 Report spills and alarms Notify A/B or regulatory authorities of incident

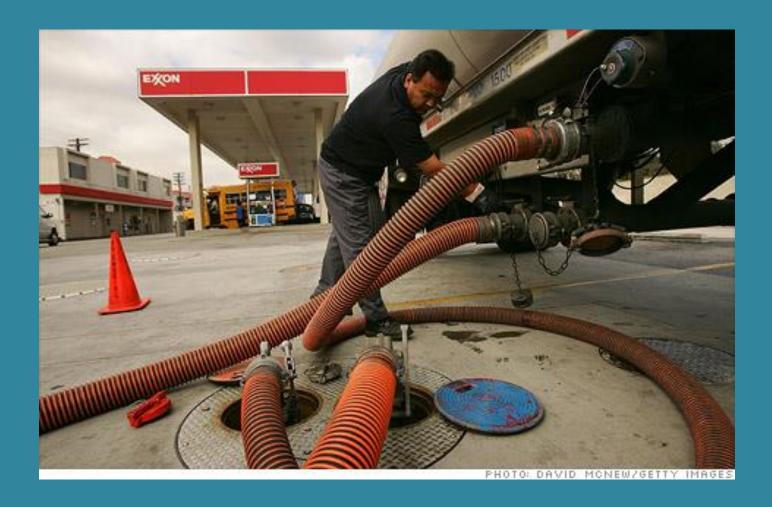


Spill & overfill prevention





Fuel Delivery





Methods of Release Detection - Tanks

- Automatic Tank Gauging (ATG)
- Secondary Containment Interstitial Monitoring
- Statistical Inventory Reconciliation (SIR)



Release Detection - Tanks

Manual Tank Gauging

 Continuous in-tank leak detection (CITLD)

 Groundwater and/or vapor monitoring



Release Detection

Tanks **and** Piping

- Tanks must be tested every 30 days
- Pressurized piping monitored continuously for big leaks (3 gallon per hour)
- Pressurized piping monitored periodically for small leaks
 - 0.2 gallons per hour or 1,752 gallons per year



Release Detection - Piping

Automatic Line Leak
 Detector (ALLD)

Interstitial monitoring

Line Tightness Test



Release Detection - Piping

• SIR

Safe Suction

Soil vapor/groundwater monitoring



Corrosion Protection (cathodic protection)

- Metal tanks and pipes without protective coating
- Impressed current or sacrificial anodes



Corrosion Protection (cathodic protection)

Impressed current systems

Inspected every 60 days

Must maintain the last three inspections



Compatibility

- Unleaded Regular
- Unleaded Midgrade
- **Unleaded Premium**
- U Diesel Ultra-Low Sulfur



Financial Responsibility



Financial Responsibility Coverage Amounts

Type or Group	Per Occurrence	Annual Aggregate
Any Petroleum Marketer	\$1 Million	\$1 Million if 100 or less tanks.
Non-Marketer with a greater than 20M net worth		\$2 Million if more than 100 tanks
Non-Marketer with less than 20M net-worth	<10,000 gal/month \$500,000 >10,000 gal/month \$1 Million	
Local Governments or Indian Tribe		

Suspected & Actual Releases

 Suspected releases must be investigated

 Actual releases must be reported, investigated and cleaned up



Notification, Closure and Registration

Generally 30 days after a change, ownership or repairs

Temporary closure (Out of service < 1 year)



Permanent Closure



Record keeping requirements

- Third party certification documentations
- 1 year of 0.2 gallon per hour test every 30 days
- Annual UST System Release
 & Monitoring Verification
- Operator Training
- Financial Responsibility



Environmental & regulatory consequences of releases





Releases to the environment must be report to the implementing agency within 24 hrs

Confirm & investigate within 7 days

• If confirmed - stop system, repair or replace

Remediate according regulations

Document everything



Failure to correct a leak or be noncompliant

Fines

Red Tagging (delivery prohibition)

Retraining



Identifying Releases

Free product or vapors

Unusual operating conditions

Unexplained loss of product



Operation & Maintenance New Installations

Effective October 13, 2015

Operation & Maintenance Requirements

Effective October 13, 2018

Secondary Containment Rule April 16, 2016

Operator Training Rule October 13, 2016

Questions?

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