

# UST Basics and Compliance Issues

Mike Arce – Compliance Assistance Inspector

Victoria Flowers - Environmental Specialist

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
<ul style="list-style-type: none"> <li>• Permits</li> <li>• Ensuring contractors are competent</li> <li>• Ensure UST rules complied with</li> <li>• Identifying and ensuring B &amp; C operators are trained and competent</li> <li>• Financial assurance</li> </ul>	<ul style="list-style-type: none"> <li>• Daily inventory</li> <li>• Monthly release detection</li> <li>• Regulatory Compliance</li> <li>• Equipment inspections</li> <li>Record maintenance                             <ul style="list-style-type: none"> <li>• ATG</li> <li>• Certifications</li> <li>• Repairs</li> <li>• Registration</li> <li>• Inspection</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Report spills and alarms</li> <li>• Notify A/B or regulatory authorities of incident</li> </ul>





# Spill & overfill prevention



# Fuel Delivery



PHOTO: DAVID MCNEW/GETTY IMAGES



Victoria Flowers,  
Environmental Specialist



# 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
-  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?

Mike Arce

[marce@oneidation.org](mailto:marce@oneidation.org)

(920)869-4552

Victoria Flowers

[vflowers@oneidation.org](mailto:vflowers@oneidation.org)

(920)869-4548