

Welcome to Tank School

NC Dept of Environmental Quality
– NCDEQ –

Division of Waste Management
– DWM –

Underground Storage Tank Section
– UST Section –

Who are we?

- ▶ Patrick Beggs
- ▶ Andria Merritt

Housekeeping

- ▶ Please turn off cell phones
- ▶ Restrooms
- ▶ **Agenda**
 - Breaks
 - Lunch

Agenda

1. Introduction
2. Operator Training
3. Inspections----- EXAM/BREAK
4. Spill & Overfill Prevention
5. Corrosion Protection: Tanks
6. Corrosion Protection: Piping----- EXAM/LUNCH
7. Leak Detection: Tanks----- EXAM/BREAK
8. Leak Detection: Piping
9. Releases ----- EXAM/Check Out

NCDEQ Division of Waste Management

- ▶ **Underground Storage Tank Section**
 - **Permits and Inspections Branch**
 - **Corrective Action Branch**
 - **Trust Fund Branch**

NOTE:

Today's presentation *summarizes* the UST compliance requirements.

For the full requirements,
please refer to:
tankschool.ncdenr.gov

Website: tankschool.ncdenr.gov

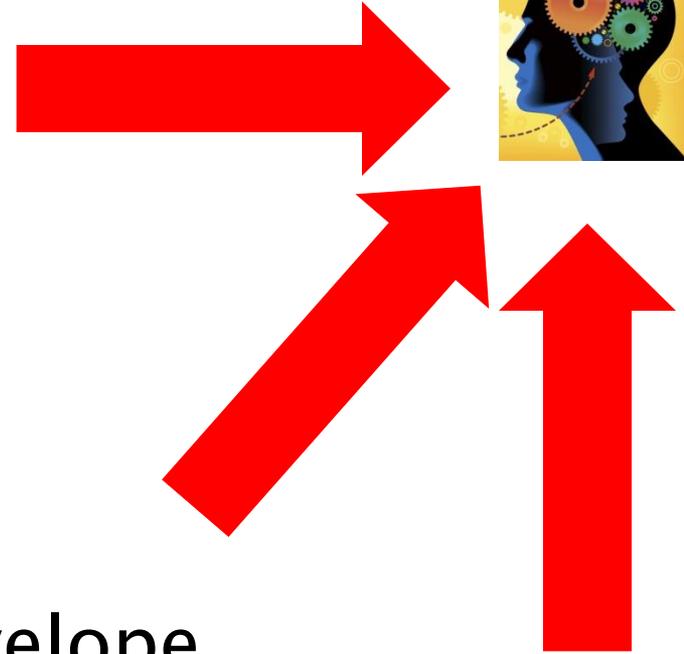
- Policy / Guidance Documents
- Forms
- Brochures
- Tank School Manual
- Training tools for ERO
- Tank School slides

Handouts

1. ERO handout
 - Emergency Response Operator Training Info
 - Tank Ownership change info
 - UST 26
 - UST system compliance plan
 - UST site diagram
 - Course evaluation
2. Training Manual
3. Inspection report / UST 10B
4. Exam / Bubble Sheet / Envelope

Exam today:

- Open book
- Completed in sections
- Don't write on Exam or Envelope
- Keep bubble sheet in envelope
- Grading during lunch and end of class



Walk ins or additional facilities

- ▶ Check in during after first exam, during break
 - Walk In Form
 - Any change of info
 - Different person attending
 - Additional facility IDs

Operator Training Requirements

NCDEQ – Waste Management
Underground Storage Tank Section



2005 Energy Policy Act
owners must designate:



Primary
Operator

&

Emergency
Response
Operator





Primary Operator



- Daily responsibilities:

- Operation
- Maintenance
- Record-keeping

- General knowledge of UST rules

- Employee of owner or facility operator –
NOT a third-party contractor





Can take place at

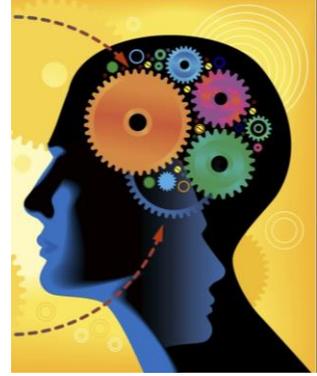


UST facility or Tank School





at the UST facility:



- During the compliance inspection
- With the UST inspector
- Facility must be in compliance





at Tank School:

Because at least one of the following:

- Primary Operator NOT present at inspection
- Facility was NOT in compliance at inspection
- You are a newly appointed Primary Operator

75% score required regardless of test location

Emergency Response Operator





Daily responsibilities:

- Control/monitor fuel dispensing
- Respond to alarms or fuel releases



- One ERO required; prefer that everyone is a trained ERO
- **Primary Operator is an ERO**
- If fuel can be dispensed, an ERO needs to be on site *(note: placard)



Emergency Response Placard

Underground Storage Tank Section
919-707-8171



In case of fuel emergency

- Press emergency fuel shutoff button
- Call 911
- Call this number for the emergency response contact at this station:

- Address of this station:



ERO Training

- ▶ Trained by **YOU** (Primary Operator)
- ▶ UST-26 form keeps track of training
- ▶ When to train:
 - Current employees – within 15 days of today
 - New employees – Before controlling fuel dispensing

Training Materials



On the web: tankschool.ncdenr.gov

includes:

- ▶ Instructions
- ▶ Slides
- ▶ UST-26 form: keep track of who has been trained



UST-26 EMERGENCY RESPONSE OPERATOR TRAINING LOG

- > This form must be utilized to document that all emergency response operators at this facility are trained according to North Carolina's UST Operator Training Plan.
- > Emergency response operators must be trained by this facility's primary operator(s) using the training materials provided by the Department.
- > Emergency response operators must be trained prior to assuming responsibility for responding to emergencies or alarms.
- > This form must be kept at the facility and made available at the time of inspection.

UST OWNER		UST FACILITY	
Owner Name		Facility Name	Facility ID#:
Street Address		Street Address	
City	State	City	County

TRAINING DOCUMENTATION

By signing this log I (emergency response operator) certify that I have been trained by this facility's primary operator (signed below) and that I have located and understand how to operate the following components and respond to an emergency:

- All emergency shutoffs
- Fire extinguishers
- Emergency phone numbers list
- Spill kit
- Tank monitor alarms and warnings (if applicable)

DATE:	EMERGENCY RESPONSE OPERATOR:	TRAINED BY PRIMARY OPERATOR:
	PRINTED NAME:	PRINTED NAME:
	SIGNATURE:	SIGNATURE:
	PRINTED NAME:	PRINTED NAME:
	SIGNATURE:	SIGNATURE:
	PRINTED NAME:	PRINTED NAME:
	SIGNATURE:	SIGNATURE:



HAVE a PLAN for your ERO

- Make sure they are comfortable doing everything they have to do
- Physically walk them through all the steps



HAVE a PLAN for your ERO

Do they know
the location of
the fuel shut off
switch?



HAVE a PLAN for your ERO



Can they turn
off power to
the dispenser?





HAVE a PLAN for your ERO

Can they bag a nozzle? Do they know where the bags are? Do you have any?





HAVE a PLAN for your ERO

- Stop or contain the leak
- Call 911 if needed
- Contact the Primary Operator.
- Is your phone # easily available?



HAVE a PLAN for your ERO

Responsibility is to ensure the spill or leak poses no immediate hazard to

- human health or safety, or
- the environment



HAVE a PLAN for your ERO

- Protect sensitive environmental receptors:
 - any place a spill may enter the environment:
storm drains, curb breaks, gutters, swales, etc.
- Stop or contain spill BEFORE it reaches the environment



HAVE a PLAN for your ERO

- Identify fire/vapor hazards:
 - Ensure spill/leak poses no immediate hazard to human health or safety



Emergency Response:



Spill Kit Recommended:

- Clean spills 5 gallons or less
- Contain larger spills until assistance arrives
- Must report spills of 25 gallons or more



Emergency Response:

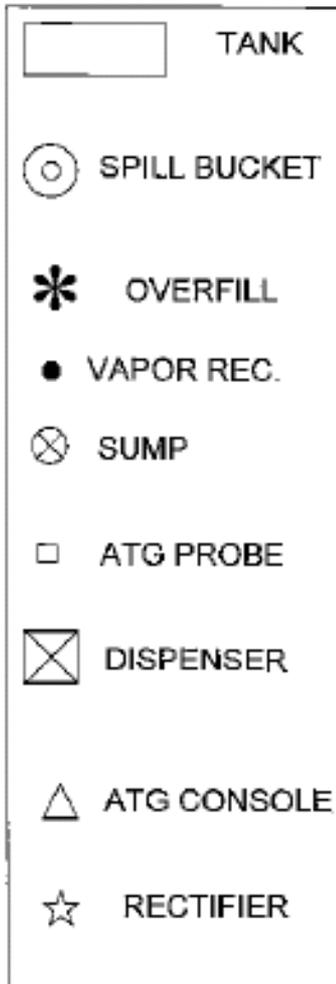
Recommended equipment for spill kit:

- Personal protective equipment – gloves
- Absorbent material (cheap kitty litter, sand, sawdust, etc.)
- Shovel, broom, bucket, booms, pads
caution tape, traffic cones



UST Site Diagram

UST Site Diagram for: _____



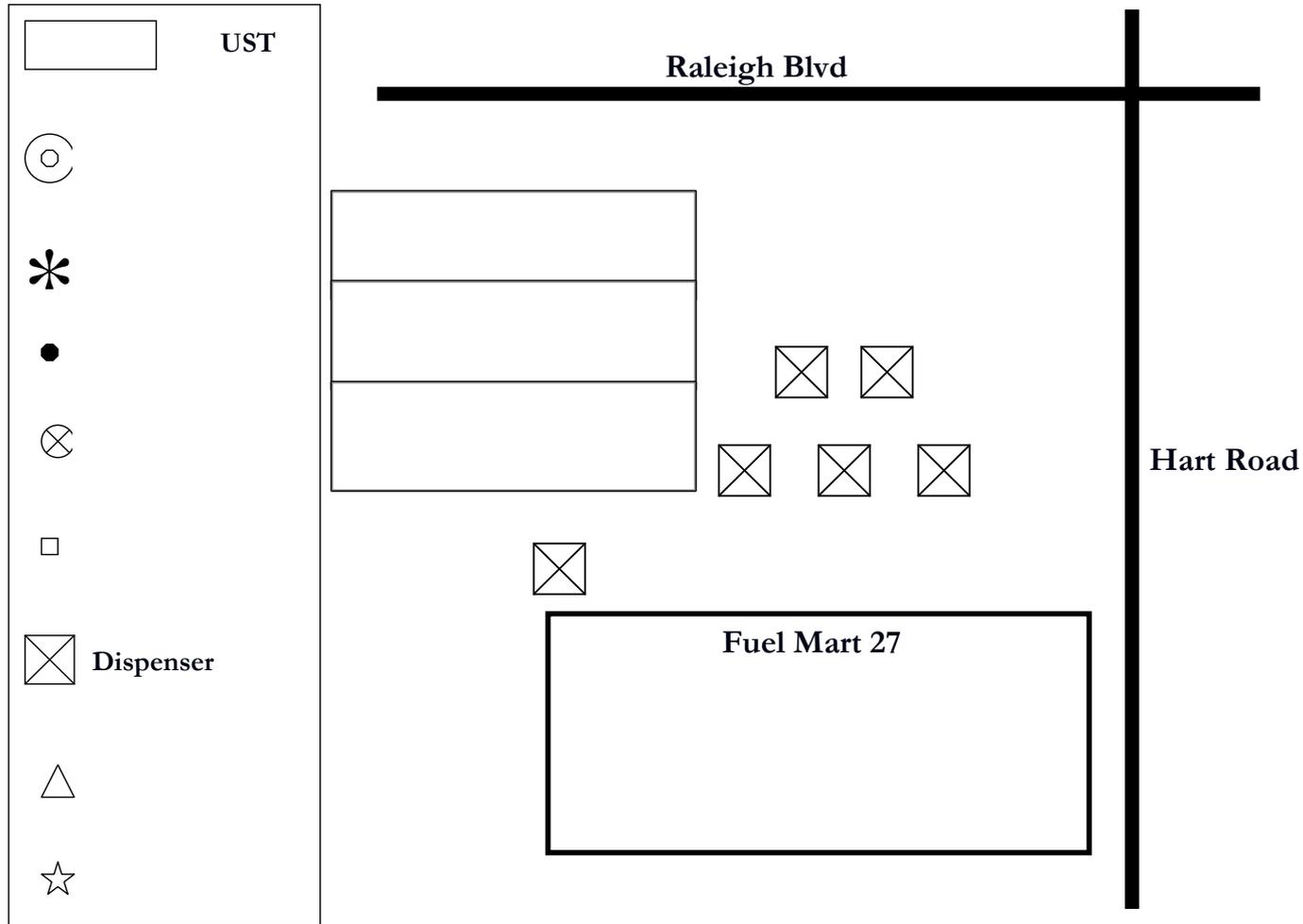
UST Site Diagram

▶ Add:

- Outline of building
- Nearest street(s)
- Tanks (use BIG rectangle symbol)
- Dispensers (use box with X)

UST Site Diagram – EXAMPLE

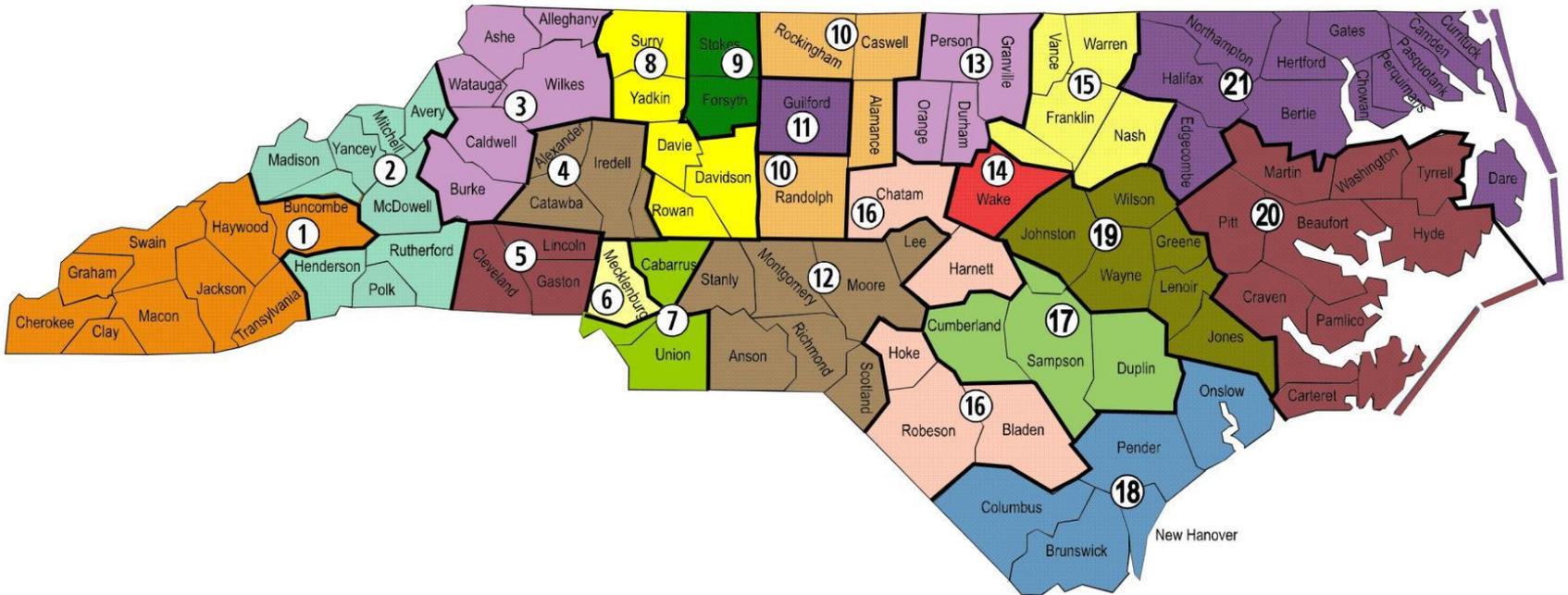
UST Site Diagram for: Fuel Mart 27



UST Inspections & Closures

NCDEQ – Waste Management
Underground Storage Tank Section

Inspector Areas



Inspectors visit each UST facility every 2-3 years

Inspections

- Physical Inspection of equipment
- Records Review
- Inspector records observations
- 1-2 hours
- Inspection checklist (UST 10B)



North Carolina Department of Environment and Natural Resources
Underground Storage Tank NC

Printed: 00/00/0000 0:00 PM
 Inspection Result: Failed
 Partial Inspection: Yes

Inspection Date: 00/00/0000
 Arrive and Depart Times: 0:00 PM-0:00 PM

Facility ID:	0-0-0000000000	Inspector	Dan Blake
Facility Name		Insp. Type	Compliance
Facility Address		Reason(s)	Routine Compliance
		Location	
		Permit Exp.	00/00/0000

CONTACTS

Contact Type	Contact Information
Operator since 00/00/0000	
Owner since 00/00/0000	

OWNERSHIP CHANGE

New Owner	Change Date	Basis	Transfer of Ownership Form (UST-15) Submitted

EMERGENCY RESPONSE

Emergency Response Operator at inspection is listed in training log?	
Emergency Response Operator log (UST-26) onsite and completed with names of trained employees?	

INSPECTOR COMMENTS

Type	Date	Comment

TANKS AND PIPING INFORMATION

Tanks	Tank #1	Tank #2	Tank #3	Tank #4
Tank ID				
Manifolded Tank				
Manifolded with tanks				
Is tank registered?				
Tank Status				
Tank closure report submitted				
Date tank last operated				
Inches of product in Tank				
Date tank installed				
New Tank System installed in accordance with NC or MI				
Tank Construction Material (DW required after 11/1/07)				
If other, description				

Annually

- ▶ Renew Operating Permit
 - Invoice
 - Compliance Questionnaire
 - Can be paid online by check:

tankschool.ncdenr.gov

Operating Permit

UST Permit

Underground Storage Tank Operating Permit Certificate

Department of Environment and Natural Resources

Division of Waste Management

Ownership of USTs:

**NORTH CAROLINA TANK OWNER
123 MAIN STREET
ANYWHERE, NC 00000**

UST Facility:

**FUEL MART 27
123 MAIN STREET
ANYWHERE, NC 00000**

Number of Large Commercial USTs (> 3,500 gallons): 3

Number of Small Commercial USTs (≤ 3,500 gallons): 0

The operating permit is valid from Jan. 01, 2010 and will expire on the last day of the month of:

12/2010

Facility ID #: 0-999999

Certificate #: 2010001330

Pursuant to the General Statutes 143-215.94U(c), no person shall place a petroleum product, and no owner or operator shall cause a petroleum product to be placed, into an underground storage tank at a facility for which the owner or operator does not hold a currently valid operating permit.

Be sure that this permit certificate is visibly displayed at the facility listed above.

Compliance Questionnaire

Compliance Questionnaire:

Facility ID#: _____

1. Mark the type(s) of **Stage I Vapor Recovery** being used (*mark all that apply for the facility*):

- Coaxial system
- Dual point system
- Vapor recovery is not required at this facility (see instructions)

Enter combined annual throughput for all **gasoline tanks** in Gallons (Gal/Yr): _____.

2. Mark the method(s) of **leak detection** being used for **underground storage tanks** (*mark all that apply for the facility*):

- Automatic tank gauging (e.g. Veeder Root, Incon, Encompass)
- Statistical inventory reconciliation (SIR)
- Interstitial monitoring
- Tank tightness testing and inventory control*
- Manual tank gauging and tank tightness testing (This method is not valid for tanks that are greater than 2,000 gallons in capacity)*
- Manual tank gauging (This method is not valid for tanks that are greater than 550 gallons in capacity)
- Vapor monitoring
- Groundwater monitoring
- Leak detection not required at this facility because:

- The USTs systems at this facility are deferred from leak detection requirements (for example, the USTs at this facility store fuel solely for use by emergency power generations**) and/or
- the USTs at this facility are not regulated (for example, the USTs at this facility store heating oil for on-site use)

*USTs that have been protected against corrosion for more than ten years cannot use these methods of leak detection beyond Dec. 22, 1998.

**Only USTs for power generation installed prior to 11/1/2007 are not required to maintain leak detection.

3. Mark the method of **leak detection** being used for **underground piping** (*mark all that apply for the facility*):

- Mechanical line leak detector (MLLD)
- Electronic line leak detection (ELLD)
- Periodic line tightness tests (LTT)
- Statistical inventory reconciliation (SIR)
- Interstitial monitoring of piping (IM)

Ownership Change

- ▶ **Complete all paperwork within 30 days**
- ▶ Previous owner's permit **NOT** valid after 30 days
- ▶ New owner must notify us of change – **use UST8** to start the process
- ▶ **SEE HANDOUT and website**

Temporary Closure

- ▶ UST remains underground
- ▶ UST taken out of service
- ▶ Owner and operator still responsible for UST

**Procedures for Placing
UST Systems in
Temporary Closure &
Returning them to
Service**



**N.C. Department of
Environment and Natural
Resources**

**Division of Waste Management
UST Section**

Temporary Closure

- ▶ Remove product to *less than* one inch
- ▶ **Lock Fill Ports**
- ▶ **Maintain corrosion protection**
- ▶ **Submit UST 8**
- ▶ **Keep paying tank fees**
- ▶ **Brochure on website**



Permanent Closure

- UST removed from ground
- Owner and operator responsible for site until all corrective actions satisfied



Permanent Closure

- ▶ Usually directed by engineer or geologist
- ▶ Guidelines issued by the Corrective Action Branch (CAB)



Non-compliance

Notice Of Violation (NOV)

If not in compliance, NOV mailed to UST owner, containing:

- ▶ Violations
- ▶ Corrective actions
- ▶ Inspection checklist

- ▶ Helpful hints
 - Write facility ID# on anything you submit
 - Call inspector: paperwork received?

Notice Of Violation (NOV)

Upon receiving a notice of violation, your Primary Operator status is invalid and you have to repeat training.

Recommendation for Enforcement



If a facility

- ▶ does not come back into compliance within given timeframe, or
- ▶ has repeat violations

the operating permit may be put on hold and owner notified with a “10-day letter”

Non-compliance



North Carolina Department of Environment and Natural Resources

Beverly E. Perdue, Governor

Dee A. Freeman, Secretary

March 1, 2010

CERTIFIED MAIL #####
RETURN RECEIPT REQUESTED

John Doe, Registered Agent
Get Gas, Inc.
123 Raleigh Road
Louisburg, NC 27549

Re: Recommendation for Enforcement Action
Get Gas Mart, 123 Raleigh Road, Louisburg, NC 27549
Franklin County
Facility ID#: 1-123456

Dear Mr. Doe:

This letter is to notify you that this office is considering recommending enforcement action to the Director of the Division of Waste Management. The recommendation for enforcement concerns the violations cited in the Notice of Violation (NOV) dated January 1, 2010 which was previously sent to you. Specifically, 15A NCAC 2N .0301 (UPG2).

If there is an explanation for the violations cited, or if you believe there are other factors which should be considered, please submit your response to me in writing within 10 days of receipt of this notice. Your explanation will be reviewed, and if enforcement action is still deemed appropriate, your explanation will be forwarded to the Director with the enforcement package for his consideration.

If you have any questions concerning this matter, please contact me at (919) 733-1791.

Sincerely,

Jessica Tarter
Environmental Specialist

cc: Ruth Strauss, Permits and Inspection Branch
Files

Division of Waste Management/UST Section, 1637 Mail Service Center, Raleigh, North Carolina 27699-1637
Phone: 919-733-9486 \ FAX: 919-733-9413 \ Internet: www.enr.state.nc.us

One
North Carolina
Naturally

An Equal Opportunity/Affirmative Action Employer - 5015 Franklin Road, Raleigh, NC 27609

Recommendation for Enforcement (10-Day Letter)

List of Violations

Deadline = 10 days

9/1/2016

Enforcement may involve:

- ▶ Facility permit put on hold
- ▶ No permit issued (no fuel delivery)
- ▶ Civil penalties
- ▶ Prove compliance to resume operation

EXAM – ONLY questions #1–9

- ▶ Put your name on the bubble sheet !!
- ▶ Use your handouts
- ▶ Use pen or pencil

- ▶ TAKE A BREAK!