Welcome to Tank School

NC Dept of Environmental Quality
- NCDEQ -

Division of Waste Management
- DWM -

Underground Storage Tank Section
- UST Section -

9/1/2016

Introduction
Who are we?

- Patrick Beggs
- Andria Merritt
Housekeeping

- Please turn off cell phones
- Restrooms
- Agenda
  - Breaks
  - Lunch
Introduction

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

9/1/2016
Operator Training Requirements

NCDEQ – Waste Management
Underground Storage Tank Section
2005 Energy Policy Act

owners must designate:

Primary Operator & Emergency Response Operator
Operator Training

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

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:
ERØ 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
# Operator Training

## 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

- **Owner Name:**
- **Street Address:**
- **City:**
- **State:**
- **County:**

### UST FACILITY

- **Facility Name:**
- **Street Address:**
- **City:**
- **State:**
- **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:

<table>
<thead>
<tr>
<th>DATE</th>
<th>EMERGENCY RESPONSE OPERATOR</th>
<th>TRAINED BY PRIMARY OPERATOR</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PRINTED NAME:</td>
<td>PRINTED NAME:</td>
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<td></td>
<td>SIGNATURE:</td>
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<td></td>
<td>SIGNATURE:</td>
<td>SIGNATURE:</td>
</tr>
</tbody>
</table>

9/1/2016
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?
HAYE 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
Operator Training

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:

- TANK
- SPILL BUCKET
- OVERFILL
- VAPOR REC.
- SUMP
- ATG PROBE
- DISPENSER
- ATG CONSOLE
- RECTIFIER
Add:

◦ Outline of building
◦ Nearest street(s)
◦ Tanks (use BIG rectangle symbol)
◦ Dispensers (use box with X)
UST Inspections & Closures

NCDEQ – Waste Management
Underground Storage Tank Section
Inspectors visit each UST facility every 2-3 years.
• Physical Inspection of equipment
• Records Review
• Inspector records observations
• 1-2 hours
• Inspection checklist (UST 10B)
Anually

- Renew Operating Permit
  - Invoice
  - Compliance Questionnaire
  - Can be paid online by check:
    tankschool.ncdenr.gov
Compliance Questionnaire:

<table>
<thead>
<tr>
<th>Compliance Questionnaire:</th>
<th>Facility ID#:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Mark the type(s) of <strong>Stage I Vapor Recovery</strong> being used <em>(mark all that apply for the facility)</em>:</td>
<td></td>
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<tr>
<td>□ Coaxial system</td>
<td></td>
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<tr>
<td>□ Dual point system</td>
<td></td>
</tr>
<tr>
<td>□ Vapor recovery is not required at this facility <em>(see instructions)</em></td>
<td></td>
</tr>
<tr>
<td>Enter combined annual throughput for all gasoline tanks in Gallons (Gal/Yr): ___________</td>
<td></td>
</tr>
<tr>
<td>2. Mark the method(s) of <strong>leak detection</strong> being used for underground storage tanks <em>(mark all that apply for the facility)</em>:</td>
<td></td>
</tr>
<tr>
<td>□ Automatic tank gauging <em>(e.g. Veeder Root, Incon, Encompass)</em></td>
<td></td>
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<tr>
<td>□ Statistical inventory reconciliation <em>(SIR)</em></td>
<td></td>
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<tr>
<td>□ Interstitial monitoring</td>
<td></td>
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<tr>
<td>□ Tank tightness testing and inventory control*</td>
<td></td>
</tr>
<tr>
<td>□ Manual tank gauging and tank tightness testing <em>(This method is not valid for tanks that are greater than 2,000 gallons in capacity)</em></td>
<td></td>
</tr>
<tr>
<td>□ Manual tank gauging <em>(This method is not valid for tanks that are greater than 550 gallons in capacity)</em></td>
<td></td>
</tr>
<tr>
<td>□ Vapor monitoring</td>
<td></td>
</tr>
<tr>
<td>□ Groundwater monitoring</td>
<td></td>
</tr>
<tr>
<td>□ Leak detection not required at this facility because:</td>
<td></td>
</tr>
<tr>
<td>□ The USTs systems at this facility are deferred from leak detection requirements <em>(for example, the USTs at this facility store fuel solely for use by emergency power generations</em>*) and/or</td>
<td></td>
</tr>
<tr>
<td>□ the USTs at this facility are not regulated <em>(for example, the USTs at this facility store heating oil for on-site use)</em></td>
<td></td>
</tr>
</tbody>
</table>

*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
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?

9/1/2016
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”
Recommendation for Enforcement (10-Day Letter)

Dear Mr. Doc,

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, 13A NCAC 2N 0301 (UPOD).

If there is an explanation for the violations cited, or if you believe there are other facts 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,

[Signature]
Jessica Tarver
Environmental Specialist

cc: Ruth Strauss, Permits and Inspection Branch

North Carolina Department of Environment and Natural Resources
March 1, 2010

9/1/2016

Non-compliance

List of Violations

Deadline = 10 days
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!