

Regulated Storage Tank

Guidance Document Stakeholder Meeting

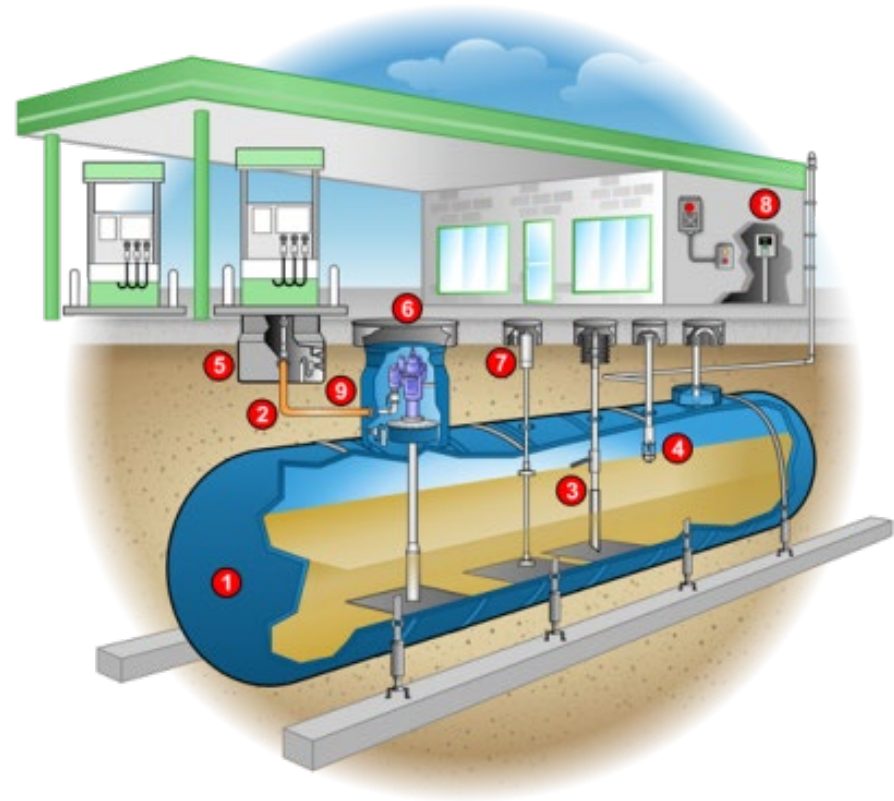


ARKANSAS
ENERGY & ENVIRONMENT

Delegated State

EPA has delegated authority to the Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) to administer the Regulated Storage Tank Program.

**DEQ was re-granted
State Program Approval (SPA)
status on February 25, 2021
from EPA Region 6.**



Pennsylvania DEP

RULE SUMMARY

- ✓ On October 13, 2015, the Underground Storage Tank (UST) federal regulations revisions became effective, increasing emphasis on properly operating and maintaining UST equipment.
- ✓ The revisions will help prevent and detect UST releases, which are a leading source of groundwater contamination.
- ✓ DEQ incorporated these revisions into Regulation 12, Storage Tanks in September 2018.
- ✓ The deadline to have new requirements completed is **October 13, 2021**.

The Revisions



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Secondary Containment Requirements

Beginning April 11, 2016, federal regulations required owners and operators to install secondarily contained tanks and piping when installing or replacing tanks and piping. However, this requirement has been in effect in Arkansas since July 1, 2007.

01

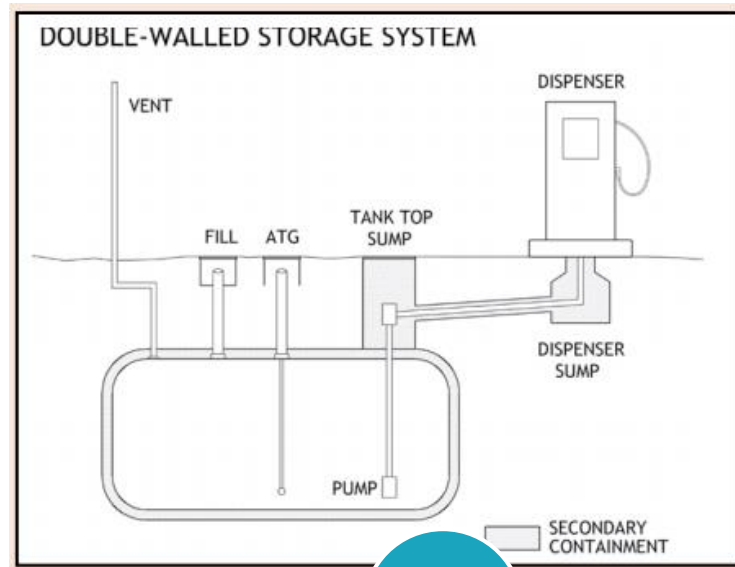
**Must use
interstitial
monitoring
as release
detection**

02

**Automatic line leak
detectors are still
required for new
and replaced
pressurized piping**

03

**Must install under-
dispenser
containment (UDC)
for all new
dispenser systems**



Montana DEQ



Walk-through Inspection:

- ✓ **Every 30 days, check the following:**
 - Spill Prevention Equipment
 - Release Detection Equipment

- ✓ **Check the following annually:**
 - Containment sumps
 - Hand-held release detection equipment

- ✓ **Must contain all the requirements listed in 40 CFR §280.36**
 - DEQ has a walk-through form available





Overfill Prevention Equipment Inspections

Beginning October 13, 2021, owners and operators must have their overfill prevention equipment inspected for proper operation at least once every 3 years.



Overfill prevention equipment must be inspected according to requirements developed by the manufacturer



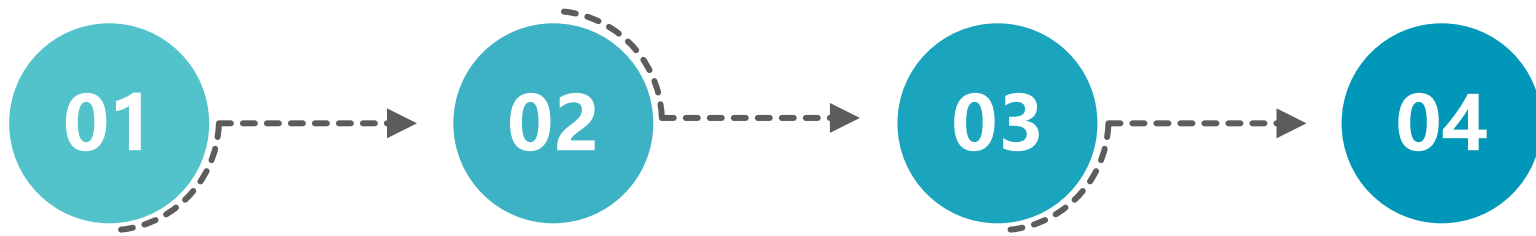
Ensure the overfill prevention equipment is set to activate at the correct level in the tank.



Owners and operators must maintain records of overfill prevention equipment inspections for at least 3 years



Spill Prevention Equipment and Containment Sump Testing



Beginning October 13, 2021, owners and operators must meet one of the following:

OPTION 1: Spill prevention and containment sump equipment is double walled and the integrity of both walls is monitored at least every 30 days for spill buckets and annually for containment sumps.

OPTION 2: Spill prevention equipment and containment sumps used for interstitial monitoring of piping are tested to determine the equipment is liquid-tight every 3 years using vacuum, pressure, or liquid testing, according to manufacture requirements

Maintain spill prevention equipment and containment sump testing or monitoring records for 3 years.



Release Detection Equipment Testing



Beginning on October 13, 2021

Owners and operators must test electronic and mechanical components of their release detection equipment for proper operation



Using the manufacturer instructions, annually check:

Automatic tank gauge and other controllers

Probes and sensors

Automatic line leak detector

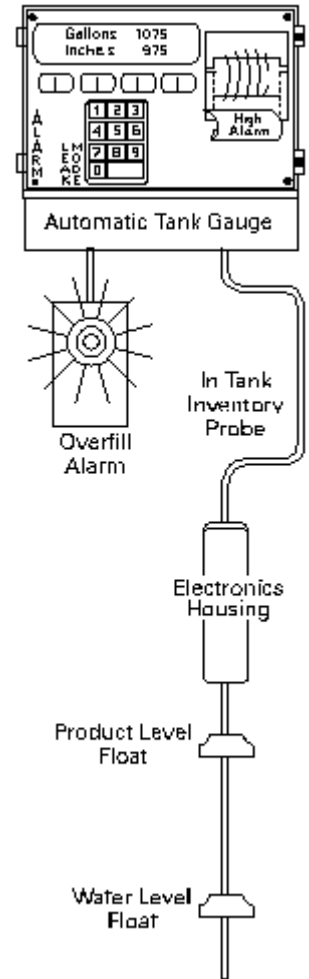
Vacuum pumps and pressure gauges

Hand-held electronic sampling equipment for groundwater and vapor monitoring



Owners and operators must maintain records

of release detection equipment testing for at least 3 years. This includes each component tested, whether each component passed the test or needed to have action taken, and any action taken to correct an issue.





Other Revisions:

✓ Biofuel Blends

Requirements to ensure UST system compatibility before storing

✓ Removed past deferrals

Emergency generator tanks, field constructed tanks, and airport hydrant systems are no longer exempt from release detection requirements.

✓ Updated codes of practice

<https://www.epa.gov/ust/underground-storage-tanks-usts-laws-and-regulations#code>

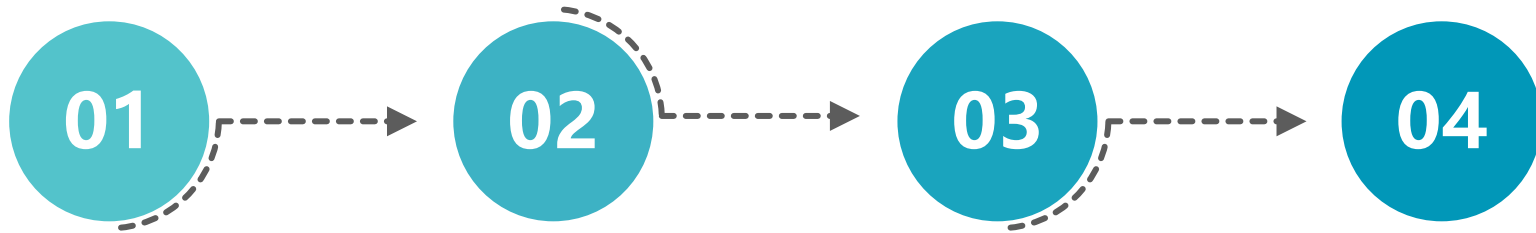


Guidance Documents

- 01 | Unusual operating conditions**
Necessitate notifying DEQ within 24 hours to generate a LUST case
- 02 | Licensing guidance**
Applies to those who are allowed to test spill prevention equipment in Arkansas
- 03 | Spill bucket testing and form**
Steps to perform a failed spill prevention or containment sump test.



Unusual Operating Conditions



Evidence of a release on-site or off-site indicators (presence of free product or vapor in soils, basements, sewer and utility lines, or nearby surface water)

Unexplained water of 1 inch or more in the tank
Liquid in dry interstice
Sudden loss of product

Statistical Inventory Reconciliation (SIR) failure/inconclusive results for one month

Failed line tightness test, tank tightness test, or spill bucket test

Erratic behavior of dispensing equipment

Unexplained alarms

Interstitial alarm

Licensing



Testing of spill buckets

shall be performed by a UST tester licensed by the State of Arkansas outlined in Regulation 12.6

Sumps

Used for interstitial monitoring are required to be tested by a licensed tester



The test method

should be recorded and certified on the provided form. A manufacturer certificate will not be required for spill prevention equipment testing.



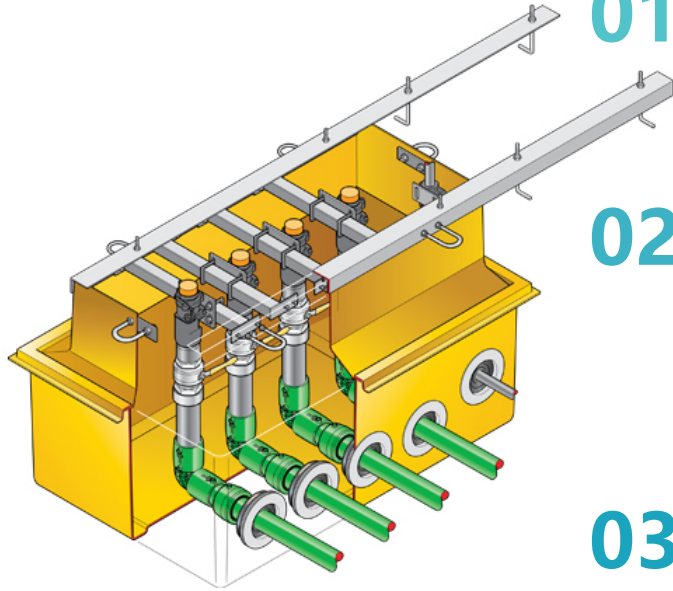
Testing Results

of spill buckets shall be recorded on the form provided by the DEQ and signed by a licensed tester





Containment Sump Testing



01

A failed containment sump test

will NOT require an automatic notification to DEQ for a suspected release

02

Keep containment sumps used for interstitial monitoring dry and monitored

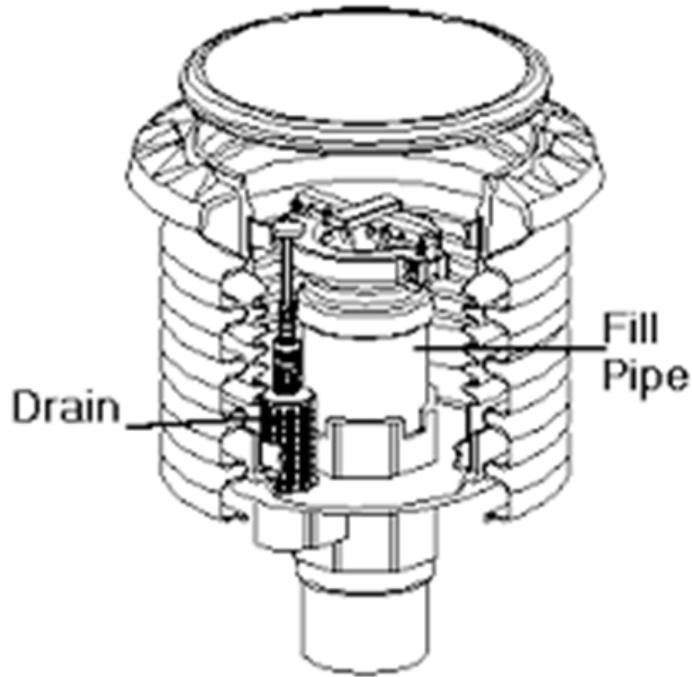
using sump sensors or visual inspections at least every 30 days.

03

Product found in a containment sump should be investigated as an unusual operating condition

The facility should submit a seven-day notice for repairs and replacement of containment sumps

Spill Prevention Equipment and Containment Sump Testing



01 | **Demonstrate equipment is liquid-tight**
by using vacuum, pressure, or liquid (hydrostatic) testing

02 | **Following the testing procedures**
set forth by the equipment manufacturer OR

03 | **Code of Practice/Industry Standard**
Petroleum Equipment Institute (PEI) document RP1200, "Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities."



Failed Test Results:

- ✓ If spill containment equipment fails an integrity test, the owner/operator is required to report a suspected Leaking Underground Storage Tank (LUST) to DEQ within twenty-four (24) hours, and follow-up with a written notification within 3 days of the failed test.
- ✓ If visual inspection of spill prevention equipment shows a problem that would result in a failed test, a suspected LUST shall be reported to DEQ

Failed Test Results:

- ✓ The facility has 7 days to confirm or deny a release has occurred and should follow steps for release investigation and confirmation found in 40 CFR Subpart E. The facility and/or their third party contractor shall provide evidence to support their claim to confirm or deny a release.
- ✓ When replacing a spill bucket, if there are no strong vapors or stained soils, this can be used as evidence to deny a release occurred.
- ✓ If groundwater wells are present, have a groundwater monitoring well assessment to show no evidence of a release.



Failed Test Results:

- ✓ The facility has 30 days to make a repair or replace the spill prevention equipment. If a repair/replacement cannot be performed in 30 days, the owner/operator must provide evidence to their DEQ inspector that replacement parts have been ordered or a repair has been scheduled with a licensed DEQ contractor.
- ✓ The facility will have 30 days to test spill prevention equipment that has been repaired or replaced. Records of passing spill prevention equipment tests should be maintained for 3 years.
- ✓ If there is no evidence of attempted compliance by the owner/operator, the UST system will be “red tagged” for delivery prohibition after the 30-day window or until a passing test



ENVIRONMENTAL
QUALITY

3-YEAR SPILL PREVENTION EQUIPMENT (SPILL BUCKET) TEST FORM

	TANK #	TANK #
Product stored:		
Test method used:	Vacuum <input type="checkbox"/>	Vacuum <input type="checkbox"/>
	Pressure <input type="checkbox"/>	Pressure <input type="checkbox"/>
	Hydrostatic <input type="checkbox"/>	Hydrostatic <input type="checkbox"/>
	Manufacturer's Instructions <input type="checkbox"/>	Manufacturer's Instructions <input type="checkbox"/>
Is the basin free of cracks or holes?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was water, fuel, trash, and debris removed from the basin prior to testing?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Drain valve operations and seals properly?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Fill pipe cap seals properly?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

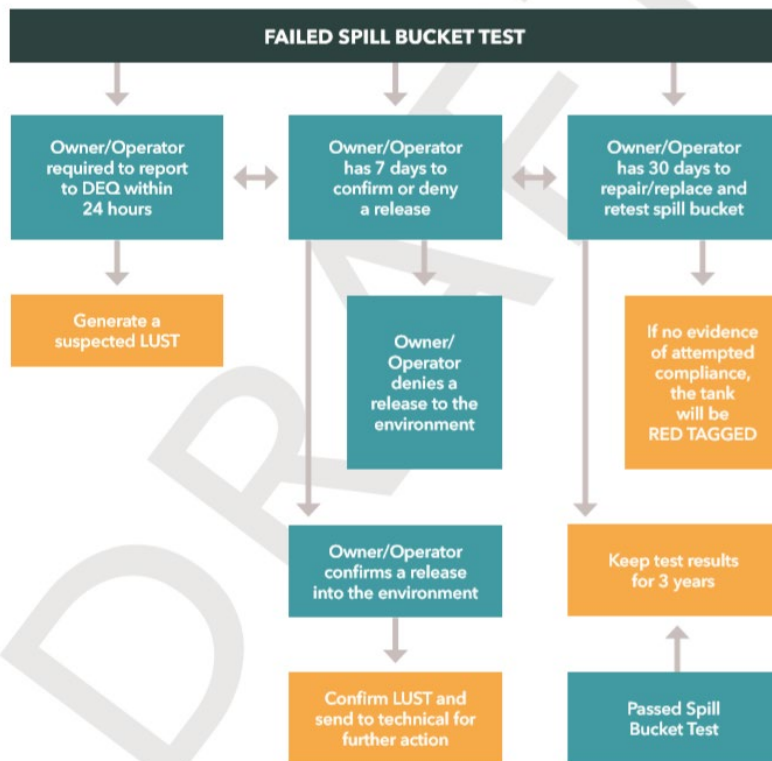
UST FACILITY INFORMATION	
FACILITY NAME: _____	
STREET ADDRESS: _____	
CITY: _____	STATE: _____ ZIP CODE: _____
COUNTY: _____	FACILITY ID #: _____
UST OWNER INFORMATION	
OWNER NAME: _____	
STREET ADDRESS: _____	
CITY: _____	STATE: _____ ZIP CODE: _____
PHONE NUMBER: _____	
TESTING CONTRACTOR INFORMATION	
TESTER NAME: _____	
TESTER COMPANY: _____	
PHONE NUMBER: _____	
I certify under penalty of law that the testing data provided on this form is true, accurate, and complete.	
TESTER SIGNATURE: _____	
SIGNATURE DATE: _____	
INSTRUCTIONS	
<ol style="list-style-type: none">Testing may be done in accordance with a nationally recognized code of practice (PEI-1200 or equivalent) or the manufacturer's instructions.A separate form should be used for each facility. If there are more than five spill buckets at this facility, make additional copies of this page.The last test record must be maintained at the UST site or must be readily available for during an inspection. Keep a copy of this form for three years.If any test fails, a report must be submitted to DEQ within twenty-four hours as a suspected release.	

TANK #	TANK #	TANK #	TANK #
Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
____ : ____	____ : ____	____ : ____	____ : ____
____ : ____	____ : ____	____ : ____	____ : ____
Pass <input type="checkbox"/> Fail <input type="checkbox"/> Inconclusive <input type="checkbox"/>	Pass <input type="checkbox"/> Fail <input type="checkbox"/> Inconclusive <input type="checkbox"/>	Pass <input type="checkbox"/> Fail <input type="checkbox"/> Inconclusive <input type="checkbox"/>	Pass <input type="checkbox"/> Fail <input type="checkbox"/> Inconclusive <input type="checkbox"/>
TANK REPAIRS			
DATE OF REPAIR	DESCRIPTION OF REPAIRS		



ENVIRONMENTAL
QUALITY

SPILL BUCKET TESTING FLOW CHART





SPILL PREVENTION AND CONTAINMENT SUMP GUIDELINES

BACKGROUND

The Underground Storage Tank (UST) federal regulations were revised and became effective October 13, 2015. Arkansas revised APC&EC Rule 12 to adopt the revisions and maintain state program approval. Those rules went into effect September 8, 2018. The Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) gave a 3 year grace period, which ends October 13, 2021, for facilities with USTs to become compliant with the revisions. Revision requirements include periodic testing of spill prevention and containment sumps used for interstitial monitoring. All initial testing must be completed by October 13, 2021.

GUIDANCE

This document outlines guidance for spill prevention equipment testers and what steps owners/operators and contractors should perform after a failed spill prevention or containment sump test.

SPILL PREVENTION

The 2015 federal revisions state that spill prevention equipment must be tested for integrity at least every 3 years, or be double-walled and periodically monitored. Spill prevention equipment testing must demonstrate that the equipment is liquid-tight by using vacuum, pressure, or liquid (hydrostatic) testing, and must follow the testing procedures set forth by the equipment manufacturer or a code of practice/industry standard such as the Petroleum Equipment Institute (PEI) document RP1200, "Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities."

FAILED TEST RESULTS

If spill containment equipment fails an integrity test or a visual inspection of spill prevention equipment reveals a problem that could result in a failed test, the owner/operator is required to report a suspected Leaking Underground Storage Tank (LUST) to DEQ within 24 hours, and follow-up with a written notification within 3 business days of discovery.



30-DAY WALK-THROUGH INSPECTION CHECKLIST

Facility Name:	Facility ID Number:
Facility Address:	Phone Number:
Write the date of inspection in the GRAY box below. Under the date, in the WHITE box beside the device/system inspected, record one of the following: <ul style="list-style-type: none">• Your initials, if the inspected device/system is satisfactory.• A "U," if the inspected device/system is unsatisfactory. Then, provide the requested information on Page 2.• "N/A" if the item is not applicable for your facility. Keep this record for no less than 1 year.	

Date of inspection (mm/dd/yy)																			
REQUIRED EVERY 30 DAYS																			
Visually check spill prevention equipment for damage. Remove any liquid and/or debris.																			
Check release detection equipment to ensure it is operating with no alarms or unusual operating conditions present.																			
For double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area.																			
Check for and remove obstructions in the fill pipe.																			
Check the fill cap to make sure it is securely on the fill pipe.																			
Ensure release detection records are reviewed and current.																			
REQUIRED ANNUALLY																			
For double-walled containment sumps with interstitial monitoring, check for leaks in the interstitial area.																			
Visually check containment sumps for damage and leaks to the containment area or a release to the environment.																			
Remove any liquid or debris from containment sumps.																			
Check hand-held release detection equipment, such as groundwater bailers and tank gauge sticks, for operability and serviceability.																			

Note: Spill prevention equipment at UST systems receiving deliveries at intervals greater than every 30 days may be checked prior to each delivery.

Page 1 of 2

Document in the space below any issues that were found during the 30-day walk-through inspection and the action taken to correct the issue(s).

Date	Issue	Action Taken



WHAT THE NEW REGULATED STORAGE TANKS REGULATION WILL MEAN TO YOU:

- Walk-through inspections are required every 30 days.
- Release detection equipment must be tested annually.
- Spill protection (spill buckets) must be tested on or before October 13, 2021, then every 3 years thereafter.
- Sumps and under dispenser containment installed after July 2007 must be tested on or before October 13, 2021, then every 3 years thereafter.
- Overfill prevention equipment must be tested on or before October 13, 2021, then every 3 years thereafter.
- Release detection requirements apply to:
 - emergency generator tanks
 - field constructed tanks
 - airport hydrant systems

This equipment is no longer exempt.

DEQ's mission is to protect, enhance, and restore the natural environment for the well-being of all Arkansans.

CONTACTS

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Amy Schluterman	Licensing and Training	501.682.0993
Jacqueline Trotta	Trust Fund Administrator	501.682.0632



Monthly



Owners must conduct a walk-through inspection of facility

DEQ form available

Annually



Owner must conduct visual containment sump and dispenser inspection, and inspect release detection

3 Years



Contractor must conduct containment sump integrity and spill bucket test.

KEEP IN TOUCH



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