

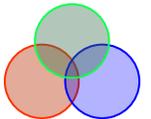
Underground Storage Tank (UST) Management for Building Managers

Training Chapter 1 of 6

Prepared for: GSA Building Managers

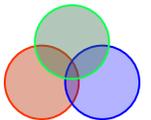
Prepared by: PBS Environment Program Team

Date: January 2008



UST Management for Building Managers

- ▶ **GSA owns & operates approximately 550 underground storage tanks (USTs) on its properties. These USTs must be managed in accordance with federal & state regulations.**
- ▶ **Building Managers have the responsibility to oversee the proper management of USTs located on GSA properties. This course provides basic UST management requirements & responsibilities to help you:**
 - *Prevent costly fines & time-consuming administrative penalties from violations of UST regulations.*
 - *Prevent accidental harm to building occupants & visitors.*
 - *Prevent damage to GSA property & environmental liability from accidental leaks & spills.*
 - *Prevent damaging community relations.*



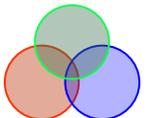
Managing Underground Storage Tanks

Training Chapter 2 of 6

Prepared for: GSA Building Managers

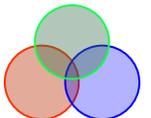
Prepared by: GSA Environment Program Team

Date: January 2008



Managing Underground Storage Tanks

- ▶ **This training provides an overview of how UST regulations apply to GSA's USTs. As a Property Manager, you have responsibilities in ensuring proper UST management & compliance with regulatory requirements.**
- ▶ **After completing this training course, you will be able to:**
 - *Identify an UST.*
 - *Determine whether federal laws apply to your UST.*
 - *List the basic requirements for UST installation.*
 - *Describe UST recordkeeping and reporting requirements.*
 - *Describe the minimum elements of a tank management plan.*
 - *Recognize documentation inspectors will request during an inspection.*



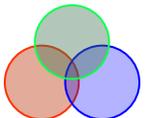
Underground Storage Tanks Basics

Training Chapter 3 of 6

Prepared for: GSA Building Managers

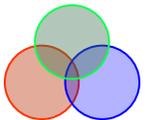
Prepared by: GSA Environment Program Team

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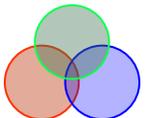
UST Basics

- ▶ An UST is a tank & any underground piping connected to the tank that has **at least 10%** of its combined volume underground.
- ▶ USTs on GSA properties are used primarily to store fuel for heating buildings and / or powering emergency generators.



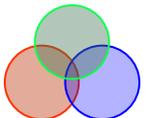
UST Basics

- ▶ **A tank system must be managed in accordance with applicable federal, state, and local requirements for installation.**
- ▶ **Installation requirements include:**
 - *Compliant design*
 - *Registration*
 - *Proper/certified installation*
 - *Lead detection- tanks & piping*
 - *Spill & overfill prevention devices*
 - *Corrosion protection*



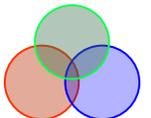
UST Basics

- ▶ **A tank system must be managed in accordance with applicable federal, state, and local requirements for operation and maintenance.**
- ▶ **Operating requirements include:**
 - *Release monitoring- tanks & piping*
 - *Records maintenance*
 - *Corrective action when a release is detected*
 - *Report/clean-up spills*
 - *Spill & overfill prevention practices*
 - *Operator training*
 - *State specific requirements*



UST Basics

- ▶ **To successfully manage USTs and comply with regulations, you must have:**
 - *Properly designed or retrofitted tank system(s)*
 - *Accurate recordkeeping*
 - *Documented proof that the tank system is managed in accordance with all regulatory requirements*



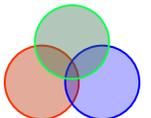
Underground Storage Tanks Regulatory Requirements

Training Chapter 4 of 6

Prepared for: GSA Building Managers

Prepared by: GSA Environment Program Team

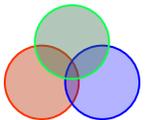
Date: January 2008



UST Regulatory Requirements

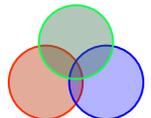
- ▶ **Federal rules apply only to USTs that have a capacity greater than 110 gallons, & contain petroleum products or hazardous substances.**
- ▶ **The following USTs are exempt from federal requirements:**
 - *Tanks used only for storing heating fuel used on the premises where it is stored.*
 - *Tanks on or above the floor of underground areas (i.e., basements or tunnels).*
 - *Tanks that are part of an emergency spill containment system.*
- ▶ **At delegated facilities, the client agency is responsible for meeting all management & operational compliance requirements associated with USTs.**

BEWARE! *In many jurisdictions, state & local requirements are more stringent than federal laws.*



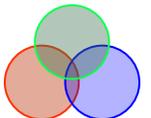
UST Regulatory Requirements

- ▶ **Records must demonstrate compliance with all applicable laws, statutes, & policies related to tank management.**
- ▶ **Records must either be:**
 - *Immediately available at UST site***or**
 - *Readily available at an alternate site.*



UST Regulatory Requirements

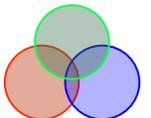
- ▶ **Maintain accurate records of all tank related activity. The following records should be retained:**
 - *Copies of performance claims provided by leak detection manufacturers*
 - *Spill reports*
 - *Inspections*
 - *Records of recent maintenance, repair, and calibration of on-site leak detection equipment*
 - *Records showing the required inspections and tests of the corrosion protection system*
 - *Monitoring records*
 - *Fill records*
 - *Tightness tests*



UST Regulatory Requirements

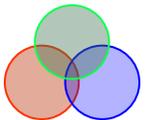
- ▶ **The Property Management and the Regional Environmental Specialist must develop a management plan for the tank(s) under their jurisdiction.**

- ▶ **Minimum Elements of a Management Plan**
 - *An inventory of all tanks.*
 - *Records of tank notifications to the state agencies.*
 - *A priority ranking system for tank closure, and/or replacement.*
 - *Release Mitigate/Response Plan.*
 - *An estimate of funds and schedule for tank project implementation.*
 - *A plan for ongoing leak detection tests and repairs.*
 - *Records management system.*
 - *Internal reporting of data to the regional office.*
 - *Site assessment results for permanent closure.*



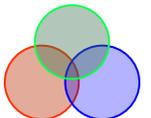
UST Regulatory Requirements

- ▶ In 2007, the Environmental Protection Agency (EPA) and state regulators launched strategies to inspect all USTs that were last inspected before 1999. Inspections may or may not be announced!



UST Regulatory Requirements

- ▶ **Inspectors will evaluate *all* evidence—primarily documentation— that can help determine the compliance status of the tanks. Inspectable items include:**
 - *Tank system design/installation criteria*
 - *Tightness tests*
 - *Registration*
 - *Installation certification*
 - *Manufacturer’s performance claims*
 - *Closure/upgrade/repair*
 - *Leak detection monitoring*
 - *Signage, etc.*
 - *Signs of spills or overfills*
 - *Records of spill reporting and clean-up*



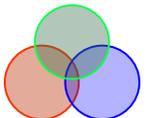
Building Manager Responsibilities

Training Chapter 5 of 6

Prepared for: GSA Building Managers

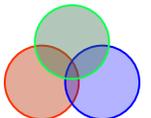
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Building Manager Responsibilities

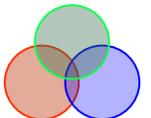
- ▶ **Building Managers have the responsibility of ensuring compliance with UST federal, state, and local requirements.**
- ▶ **Determine the owner of each tank, and maintain an accurate inventory of all USTs (including heating oil and fuel oil) at GSA-controlled facilities, and for tanks for which GSA manages a service contract.**
 - *Be fully aware of the location, size, contents, and condition of all USTs.*
 - *Ensure all tanks are properly registered with state and local authorities.*
 - *Ensure that tanks are properly operated and maintained.*
 - *Check exposed components of tank for signs of corrosion.*
 - *Ensure that leak detection systems are operational.*



Building Manager Responsibilities

- ▶ **As a Building Manager, you have the responsibility to:**
 - *Budget for tank repairs and upgrades in R&A requests.*
 - *Notify regional environmental staff immediately of any release (spill or leak).*
 - *Notify state of reportable spills (suspected and confirmed).*
 - *Coordinate spill clean-up, and the remediation of leaking USTs.*
 - *Monitor tank contractor performance to ensure their compliance with UST management regulations.*
 - *Verify that tenant owned/operated tanks are managed properly.*
 - *Upgrade or close tanks installed before 1988.*

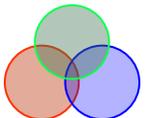
NOTE: *Your Regional Environmental Specialist is your primary contact to assist you in carrying out these responsibilities.*



Building Manager Responsibilities

- ▶ **Building Manager's are responsible for:**
 - *Notifying contractors of their responsibilities in managing USTs.*
 - *Working with GSA Contracting Officers to ensure that contractors have appropriate qualifications and training to meet management requirements of USTs.*
 - *Overseeing contractor operations and coordinating with your Regional Environmental Specialist to ensure that contractors abide by all federal, state, and local laws and regulations regarding USTs.*
 - *Notifying your Regional Environmental Specialist and Contracting Officers if a contractor fails to adhere to UST management requirements.*

- ▶ **Contractor oversight is integral to UST management.**



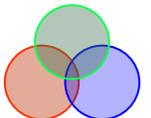
Assessment

Training Chapter 6 of 6

Prepared for: GSA Building Managers

Prepared by: GSA Environment Program Team

Date: January 2008

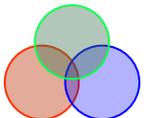


Assessment

▶ **Why is the proper management of USTs important?**

- A. Proper UST management is not important
- B. To protect human health and the environment
- C. To meet the standards of a U.S. EPA voluntary program

Answer: B. The proper management of USTs will decrease the frequency and severity of spills and leaks, which can have a harmful effect on human health and the environment.

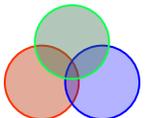


Assessment

- ▶ **What are some of the risks associated with non-compliance of UST regulatory requirements?**

- A. Financial liability resulting from expensive clean-up operations
- B. Immediate closure of UST by U.S. EPA
- C. Damaging community relations
- D. Spills or leaks that pose a potential threat to the environment

Answer: A, C, and D. Potential risks of non-compliance include financial liability, spills and leaks, damaging community relations, and endangering the health and safety of building tenants and personnel.

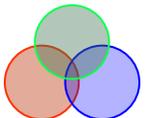


Assessment

- ▶ **An UST is a tank and any underground piping connected to the tank that has at least 40% of its combined volume underground.**

- A. True
- B. False

Answer: B. An UST is a tank and any underground piping connected to the tank that has at least 10% of its combined volume underground.

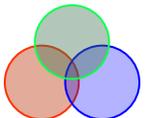


Assessment

- ▶ **Which of the following is not a basic requirement of an UST?**

- A. Compliant design
- B. Mercury detection
- C. Records maintenance
- D. Release monitoring

Answer: B. Lead detection is a basic requirement of an UST, not mercury detection.



Assessment

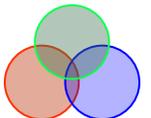
- ▶ **What critical elements prove to an inspector that your UST is in compliance?
Check all that apply.**

- A. Proper design/retrofitting of tank

- B. Accurate recordkeeping

- C. Documentation that proves that your tank system is managed in accordance with all federal, state, and local regulations.

Answer: A, B, and C. The above three elements are the most critical elements for a successful tank management program. If your facility's UST management plan meets these three requirements, your inspection is likely to be a success as well.



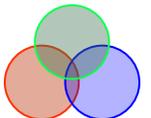
Assessment

- ▶ **Federal rules only apply to USTs that have a capacity greater than 110 gallons, and contain petroleum products or hazardous substances.**

- A. True

- B. False

Answer: A. However, be aware of the fact that many state and local requirements are more stringent than federal laws.

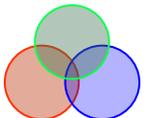


Assessment

- ▶ **What kind of USTs are exempt from federal requirements? Check all that apply.**

- A. Tanks that are part of an emergency spill containment system
- B. Tanks on or above the floor of underground areas
- C. Tanks used only for storing heating fuel used on the premises where it is stored
- D. Tanks that store hazardous chemicals

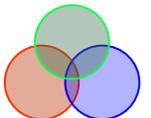
Answer: A, B, and C. Tanks that meet one of these three criteria are the only tanks exempt from federal requirements.



Assessment

- ▶ **Which of the following is a required element of a tank management plan?
Check all that apply.**
- A. Release mitigate/release plan
 - B. Reporting procedures for notification of releases
 - C. Inventory of only leaking tanks
 - D. A plan for ongoing leak detection tests and repairs
 - E. Records of tank notifications

Answer: A, B, D, and E is correct. These items are just four of the eight minimum elements of a tank management plan.



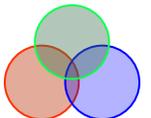
Assessment

- ▶ **USTs that were last inspected before 1999 are exempt from U.S. EPA and state environmental agency inspections.**

- A. True

- B. False

Answer: B. The U.S. EPA and state environmental agencies have developed an inspection strategy for all tanks that have not been inspected since 1999.

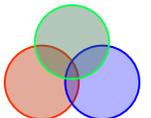


Assessment

- ▶ **What are some of the Building Manager's responsibilities for ensuring the proper management of USTs? Check all that apply.**

- A. Notify contractors of their responsibilities in managing USTs.
- B. Maintain accurate records of all tank related activity.
- C. Train all employees on UST management.
- D. Coordinate spill clean-up, and the remediation of leaking USTs.

Answer: A, B, and D. The Building Manager is not responsible for C. A complete list of the Building Manager's responsibilities can be found back in the training slides.



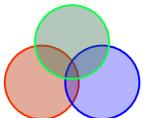
Assessment

- ▶ **Regional Environmental Specialists are your primary contacts to assist you in carrying out your UST management responsibilities.**

- A. True

- B. False

Answer: A is correct. In addition, active communication between Regional Environmental Specialists and Building Managers will ensure that contractors abide by UST regulations.



Questions?

For more information on UST management consult the following sources:

EPA UST Home Page:

www.epa.gov/OUST

Operating and Maintaining USTs:

<http://www.epa.gov/OUST/ustsystem/tanko&m.htm>

State Information:

<http://www.epa.gov/OUST/states/index.htm>

