Underground Storage Tank (UST) Management for Building Managers

Training Chapter 1 of 6

Prepared for:  GSA Building Managers
Prepared by:  PBS Environment Program Team
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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

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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  
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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

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**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*
  - *Readily available at an alternate site.*
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*

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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

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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.
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/ustsystm/tanko&m.htm

State Information: 
http://www.epa.gov/OUST/states/index.htm