

UTAH TANK NEWS

**January
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INSIDE:

New Testing Deadline Looms!	1-3
Testing Spill Buckets	3
Facility ID# 4002511, Release ID NHC – Former Truckar Service	4
What's Wrong with this Picture?	5
Important Dates to Remember	5
Certification Corner	6

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New Testing Deadline Looms!

by Doug Hansen

We are just under a year away from the deadline to meet the new Federal requirements for periodic inspection and testing of underground storage tank (UST) equipment. By October 13, 2018 all UST operators will be subject to new requirements to inspect or test portions of their UST systems to ensure they are functioning properly in addition to current testing requirements. A summary of what is required follows.

Annual Inspections

This section applies to all USTs. You must verify functionality of the automatic tank gauging (ATG) system. This will include confirming proper operation of all sensors and probes, ensuring proper connectivity of all electronics and determining the proper setup and function of the console (including the battery backup). This process must be completed by a Utah certified tester or installer. In addition, all automatic line leak detectors must be tested. This requirement is new for electronic line leak detectors, but is already a requirement for mechanical line leak detectors. These leak detector tests must simulate a release and be conducted by a Utah certified tester.

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Three-year Testing

Operators must test the spill bucket on each UST at least once every three years and this requirement applies to all USTs. The first test must be completed prior to October 13, 2018. If the spill bucket fails the test, it must be repaired or replaced and retested. Hydrostatic tests may be performed by a Utah certified tester, installer, or the UST operator. Results must be provided on the state approved form (available on our website) or the form from Appendix C-3 of the Petroleum Equipment Institute Recommended Practice RP-1200 (PEI RP-1200). Photos of the test must be included and all test water must be properly disposed.

Each UST is required to have an overfill prevention device that must be tested or inspected at least every three years. The first inspection or test must be conducted by October 13, 2018 and must be conducted by a Utah certified tester or installer. The testing or inspection requirement varies by type of device. In all cases the device must be verified to be at the proper depth within the tank.

- For Automatic Shutoff Devices (flapper valve), the manufacturer's recommended test or inspection method should be followed and documented. Alternatively, the method outlined in PEI RP-1200 may be followed. Results of the inspection or test should be reported on the form contained in Appendix C-5 of PEI RP-1200 or on a form provided by the manufacturer.
- For overfill alarms, the test should verify that the alarm is triggered at the proper product level within the tank in accordance with the procedure outlined in PEI RP-1200, and should be documented on the form in Appendix C-6 of that document.
- Ball floats must also be inspected in accordance with the procedure in section 7.2 of PEI RP-1200. The report form found in Appendix C-5 should also be used to document this inspection. Defective ball floats may not be repaired or replaced. If a ball float is found to be defective another form of overfill protection must be installed.

Finally, all sumps that are part of interstitial monitoring for piping leak detection must be tested every three years. As is the case with the other requirements described here, the first test must be completed prior to October 13, 2018. This requirement only applies to facilities that use interstitial monitoring for leak detection. This will include any UST system or piping installed after October 1, 2008 when the secondary containment requirements went into effect. Some double-walled piping systems installed prior to October 1, 2008 are using interstitial monitoring for leak detection and are subject to this requirement as well. USTs that are exempt from this requirement are any UST system and piping installed prior to October 1, 2008 that use annual line tightness testing and an automatic line leak detector to meet the piping leak detection requirements.

Sumps should be tested in accordance with PEI RP 1200. If the sump fails the test, it must be repaired or replaced and retested. Hydrostatic tests may be performed by a Utah certified tester, installer, or the UST operator. Results must be provided on the state approved form (available on our website) or the form from Appendix C-4 of the PEI RP-1200. Photos of the test must be included and all test water must be properly disposed.

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Incentive Not To Wait

We anticipate that Certified testers and installers qualified to do this work will become very busy as the deadline draws near and encourage you to get the work done early. It would be wise to coordinate with your service provider to have this work completed in conjunction with any annual leak detector or line testing already scheduled. Any of the newly required annual testing and inspections conducted prior to the October 13, 2018 deadline will be considered valid for a period of 18 months or until October 13, 2019, whichever comes first. Additionally, any new testing or inspection required every three years that is conducted between October 13, 2017 and October 13, 2018 will be considered valid until October 13, 2021.

The Division of Environmental Response and Remediation (DERR) will begin holding free workshops in January to help clarify these new requirements. We will email notices and publish dates on our website as these workshops are scheduled. In the meantime, feel free to contact a member of the UST Compliance Section with any questions you may have at (801) 536-4100.

Testing Spill Buckets

by Bruce Hagans

The new EPA underground storage tank rules approved in 2015 require inspection and testing of spill prevention equipment. This discussion will focus on the inspection and testing of single-walled and double-walled spill buckets. Vapor recovery containment buckets are not required to be tested.

Utah Certified UST Testers or UST Installers (Testers) can test all single and double-walled spill buckets. If specific test equipment is required, they must have training on that equipment. Testing must follow either the manufacturer's protocol or a test protocol described in PEI/RP1200-17. Tank operators may conduct hydrostatic tests on their own UST systems. The manufacturer's hydrostatic protocol or the protocol described in PEI/RP1200-17 may be used. Results of hydrostatic tests must be reported on the form in PEI RP-1200 or on the Utah Spill Prevention Test form, which can be found at the following link: <https://deq.utah.gov/Divisions/derr/branches/ust/index.htm>. Photos must be taken to document hydrostatic tests.

Water used to test a spill bucket may be reused for testing multiple spill buckets at a facility. Regardless of who conducts the test, proper disposal must be documented on the Utah Spill Prevention Test form. At the time of testing all clamps, lids, gaskets or fittings used in the bucket should be confirmed to be tight. Drains located in most single-walled spill buckets can allow water to drain into the tank. Though not required, owners are encouraged to have the drain removed and plugged to prevent water ingress.

Most double-walled spill buckets have a gauge used to monitor the space between the outer and inner bucket for liquid. If liquid is found in this space, it must be removed and the spill bucket must be repaired and retested in accordance with the manufacturer's protocols.

In order to demonstrate compliance with the new regulations, Tank Owners are required to send passing test results to the DERR before October 13, 2018. Since spill buckets must be tested at least every three years, a record of the passing results must be maintained for three years or until the next passing test is completed.

Facility ID# 4002511, Release ID NHC

Former Truckar Service

by Morgan Atkinson

The Crossing at South Salt Lake is an important transit oriented development project in the heart of South Salt Lake. The first phase of this mixed use development, with WinCo Foods as the anchor tenant, opened in November 2017 bringing additional retail opportunities to this community.

Petroleum contaminated soil and groundwater was discovered during the initial site assessment activities for this property in July 2015. Historic records indicate a former service station with underground storage tanks was the source of the contamination and a Leaking Underground Storage Tank (LUST) release was opened.



Since the tanks were reportedly removed in 1974 and the responsible party was long gone, South Salt Lake City as the property owner, submitted a Corrective Action Plan (CAP) to clean up the site.

The City needed a No Further Action (NFA) letter as the 'golden ticket' to allow future development and had to move quickly to secure a deal with the Boyer Company and WinCo Foods. In just under a month's time, approximately 10,000 cubic yards of soil was excavated and disposed of and several thousand

gallons of impacted groundwater was treated at the site for the remedial activities. Confirmation sample results for both soil and groundwater achieved cleanup levels and a No Further Action letter was issued to South Salt Lake City on December 12, 2016.

For additional protection and to help facilitate this project, the Boyer Company and WinCo Foods requested an Enforceable Written Assurance (EWA) from the DERR. As part of the EWA process, Reasonable Steps for the project were established to help guide both development and future use. The EWA was issued in February 2017 and construction of this first phase commenced shortly thereafter setting the stage for future construction as part of the Crossing at South Salt Lake development.

~ continued on page 5

What's Wrong With This Picture?

by DeAnn Rasmussen

You're looking under the dispenser and see the following. What's wrong with this picture? See answer below.



ANSWER: The test valve/port is below the shear/shut-off valve; therefore, if it breaks off it will render the shut-off valve useless. To correct this issue, take off the 2" test valve/port and install a plug.

Important Dates to Remember

1. Certificates of Compliance are mailed around the 15th of December.
2. The Secondary Containment Tests that qualify for the rebate are due December 15th.
3. Throughput forms are mailed out around March 15th.
4. Throughput forms are due on April 30th.
5. Annual tank registration and PST Fund fee invoices are mailed around May 15th and the payment deadline for these fees is June 30th.
6. Any facility that has not paid the annual fees by September 1st will lose PST Fund coverage and the Certificate of Compliance will lapse.
7. New Inspection and Testing Requirements Deadline is **October 13, 2018!**

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Certification Corner

EXAMS for A/B Operators, UST Samplers, and UST Contractors

Testing will be conducted each month on the first Tuesday at 9:00 a.m. and the third Tuesday at 2:00 p.m. at the DEQ/DERR office located at 195 North 1950 West, Salt Lake City. All students must submit their application, supporting documentation and fees to DERR at least one week prior to taking the exam. Please contact Michelle Horning at mhorning@utah.gov to register.

CERTIFIED UST CONSULTANT ~ Initial Exam and Renewal Course Schedule

The renewal course will begin promptly at 9 a.m. and finish at 1:00 p.m. The comprehensive exam will begin at 2:00 p.m. The next date for this exam is Thursday, February 15, 2018. The UST comprehensive exam is also offered the first Tuesday of each month and the third Tuesday of each month. If you have any questions, please contact Michelle Horning at mhorning@utah.gov.