

UTAH TANK NEWS

**Summer
2018**

Buckets and Sumps

by Doug Hansen

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In recent months the EPA clarified its interpretation of the new rules pertaining to double-walled spill buckets and sumps that use crossover (or jumper) tubes. Here is some guidance to help facilities within Utah meet the requirements of the new rules where our interpretation may differ from that of the EPA.

Spill Buckets

Under the clarified interpretation of the rule exempting double-walled spill buckets, only those monitored continually for pressure, vacuum, or with a liquid-filled interstice qualify to be exempt from 3 year tests. In Utah, we will also allow those double-walled spill buckets equipped with a liquid sensor to forgo the 3-year testing requirement if:

- the liquid gauge is checked as part of the monthly walkthrough inspection, and
- the result for each month is noted on the UST Operator Inspection form.

If the gauge is not functioning or ever indicates liquid is present, it will be required to be repaired (with any liquid removed) and the bucket tested.

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Sumps with Crossover Tubes

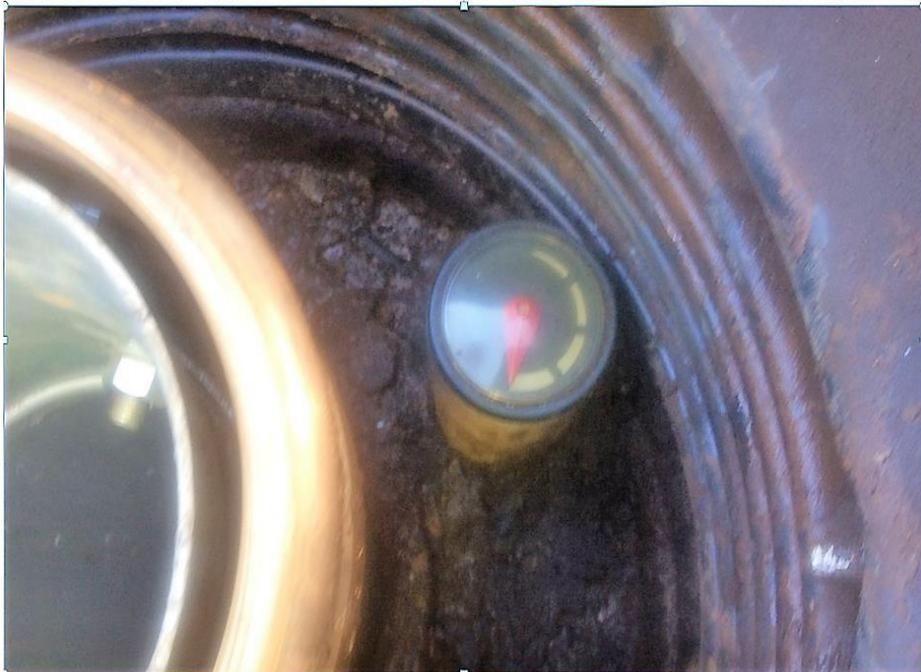
In some cases, crossover (or jumper) tubes are used to connect the interstice of double-walled piping across a sump. EPA has clarified that sumps with crossover tubes will still need to be tightness tested every 3 years. This interpretation is different from our earlier understanding of how these sumps would be viewed. In Utah, for under dispenser containment (UDC) sumps with crossover tubes, we will not require the 3 year test if:

- crossover tubes are in place,
- the UDC is kept free of debris, water, and product,
- the UDC is inspected monthly, and
- results of monthly inspection are recorded on the UST Operator Inspection form.

If, in the future, EPA requires Utah to adopt their interpretation on either, or both, of these two issues, we will work to enact a reasonable transition timeline so that operators will be able to meet any additional requirements.

What's Wrong with this Picture?

by DeAnn Rasmussen



Do you have a gauge in your double-walled spill bucket? Can you read it? We often see gauges that are so fogged over that you can't read them OR the gauge is not functioning at all. Make sure these gauges are working properly. If a gauge has failed, a tightness test for the spill bucket must be done to ensure that overfill protection is still intact. In this photo, the gauge should be pointing all the way to the left towards the skinny end!

Good news! The EPA has recently approved low-level sump testing. For more information, follow this link: <https://www.epa.gov/ust/low-liquid-level-ust-containment-sump-testing-procedures>

Emergency Generator Tanks Must Now Do Leak Detection

by Gary Harris

In the past Emergency Generator systems were deferred from leak detection. Now, Emergency Generator Systems have the same requirements as gas stations. Beginning **October 13, 2018** Federal and State regulations require that Emergency Generator Tank systems begin conducting monthly tank and piping leak detection.

Tanks basically have 2 options:

1. In-tank leak detection with an automatic tank gauge (ATG), or
2. Interstitial monitoring (double-walled tanks only)

Piping leak detection options depend on the system configuration. Most systems have two sets of piping. Depending on the configuration, will determine the type of leak detection required.

1. Supply Line, which could be gravity fed, suction or pressurized.
2. Return line, which could be either gravity fed or pressurized.

In addition to leak detection ALL UST systems must do the following by October 13, 2018:

1. Spill Bucket testing (3 year requirement)
2. Overfill device testing (3 year requirement)
3. ATG testing (1 year requirement)
4. Sump testing (3 year requirement, if applicable)
5. Line Leak Detector (1 year requirement, if applicable)

REF: 40 CFR 280 and EPA MUST FOR USTs (Nov 2015)

If you have questions about any of the new requirements for emergency generator systems, please contact a member of the UST Staff at (801)-536-4100.

Important Dates to Remember

1. Certificates of Compliance are mailed around the 15th of December.
2. The Secondary Containment Tests to 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, October 18, 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.