



# Compliance Strategies and Benefits

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# Welcome

## Agenda

- Introduction
- Proposed Revisions to Federal Regulations
- Best Practices for Fuel System Compliance
- About Tanknology
- Contact Information



# Proposed Regulations

## Operator Training

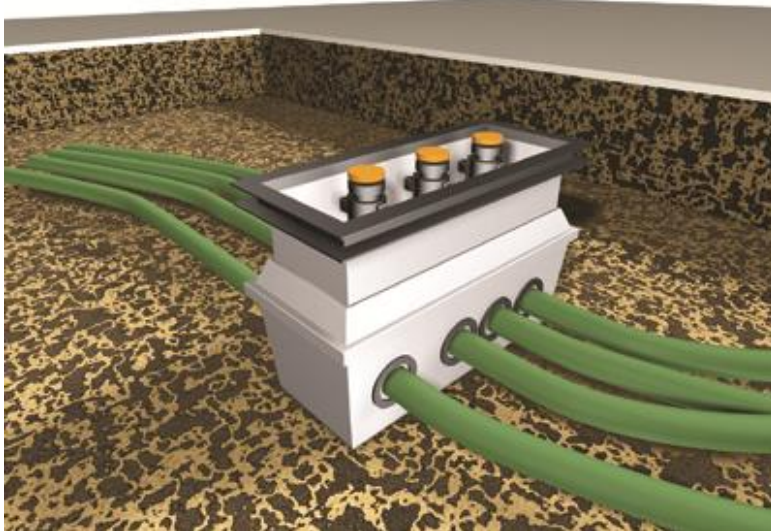
- Requirement for A, B, C Operators at every Gas Dispensing Facility, or GDF.
- Requirements for certification for each level of operator
- Online Training Approved for Most States
- Deadline: **August 8, 2012**



# Proposed Regulations

## Secondary Containment

- Secondary containment and interstitial monitoring required in all new tank and piping installations
- Applies to repairs of more than 50% of any piping run.
- Includes sumps and under dispenser containment.



- Deadline: **Immediate**

# Proposed Regulations

## Operation and Maintenance (O&M)

- Cathodic protection testing every 3 years – no change
- Periodic internal lining inspections – no change
- Annual LLD testing – no change
  
- Monthly walk through inspections – due immediately
- Annual spill bucket testing or double wall buckets with continuous interstitial monitoring – due within 1 year.

# Proposed Regulations

## Operation and Maintenance (O&M)

- Overfill prevention – tested ever 3 years
- Secondary containment tested every 3 years or continuous monitoring required.
- Phased in over 3 years based on tank installation date.
- Release detection equipment (ATG system and LLD's) – Annual testing required, due within 1 year of regulation

# Proposed Regulations

## Deferral Elimination

- Release detection required on generator storage tanks within 1 year of approval.



# Proposed Regulations

## Overfill Equipment

- Vent valve flow restrictors (ball floats) will no longer be an option for overfill protection on new installations or during replacement. Due immediately.





# Proposed Regulations

## Internal Tank Lining

- Owners must permanently close tanks where internal lining is the sole method of corrosion protection if the lining fails the periodic inspection and cannot be repaired to code.
- Due immediately.

# Proposed Regulations

## State Program Approvals

- EPA has updated State Program Approval requirements, addressing delivery prohibition, operator training, and Energy Act of 2005.



# Best Practices

## Two Ways To Manage Forecourt Compliance

Self Manage/ Manage by Exception

Wait for the NOV to Arrive

-OR-

Implement a Proactive Compliance Program,  
Operator Training, Periodic Inspections  
and Required Testing

# Best Practices

## Managing By NOV

- Non-Compliance
- Enforcement (NOV-Notice of Violation)
- Penalties (Up to \$????/tank/day of violation)
- Impacts Business
- Uncontrolled Expense
- Possible Environmental Impact

Remember.....One NOV from an Inspector could mean several return visits. You are now under a **Microscope** of continued compliance. Not to mention, the Penalty.



# Best Practices

Implement a Proactive Compliance Program

## Minimize:

- Enforcement Actions (NTC-Notice to Comply)
- Penalties (Very Minimal to No Penalty)
- Controlled Impact to Business
- Controlled Expense
- Control Possible Environmental Impact

# Best Practices

## Record Keeping

It is the responsibility of the owner/operator to maintain on site the most current copies of all testing, certifications and permits. The minimum records required to be produced on site are the following:

- Monitor Certification Test(Includes LD Test)
- Spill Bucket Test
- Tank Test
- Line Test
- Other Tests (If Applicable)
- Air Quality Tests and Permit
- Permit to Operate

# Best Practices

## Record Storage

- Keep copies of all tests, certifications and permits in one location.
- Keep all test records in chronological order. (by date, newest to oldest)
- Keep one binder for UST tests and permits.
- Keep one binder for air quality tests and permits.
- Always defer to local inspector for any specific preferences.

# Best Practices

## Record Storage Example

1	UNIFIED PROGRAM FACILITY PERMIT
2	UNDERGROUND STORAGE OPERATING PERMIT
3	CERTIFICATE OF FINANCIAL RESPONSIBILITY
4	UST MONITORING PROCEDURES EMERGENCY RESPONSE PLAN
5	OWNER/OPERATOR AGREEMENT
6	MONITOR SYSTEM CERTIFICATION
7	SECONDARY CONTAINMENT TESTING RESULTS
8	DESIGNATED OPERATOR MONTHLY CHECKLIST REPORTS
9	DESIGNATED OPERATOR EMPLOYEE TRAINING
10	INTEGRITY TEST/SPILL BUCKET TEST RESULTS
11	HAZARDOUS MATERIALS BUSINESS PLAN
12	HAZARDOUS WASTE MANIFESTS AND OTHER DISPOSAL RECORDS
13	MAINTENANCE AND REPAIR RECORDS FOR UST SYSTEM
14	SPILL LOG
15	EPA ID NUMBER



# Best Practices

## Hazardous Waste Storage

- Remember all liquid and debris removed from any fuel area is to be treated as a hazardous waste and disposed of properly.
- Place it in your hazmat barrels located on each site.
- Make sure hazmat labels are placed on containers and filled out properly.

# Best Practices

## Fill and Vapor Spill/Overfill Buckets



- Spill & Vapor Buckets Must be kept Clean & Dry At all times
- Remove any standing liquid and/or debris
- Check caps for tight seal

# Best Practices

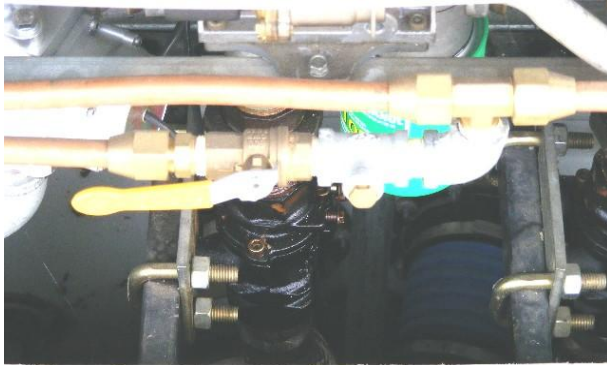
## Tank Sumps



- Sump must be kept clean and dry.
- Sensor must be at the lowest point.
- Sensor must be in a straight up and down position.

# Best Practices

## Dispensers



- Dispenser pan must be kept clean, dry, free of leaks.
- Check hanging hardware for cracks or leaks. (hoses, nozzles, break-a-ways etc)
- Sensor must be at lowest point.
- Sensor must be straight up and down.



# Best Practices

## Monitoring System

- You must perform a daily inspection (daily check) of your monitor system. (Veeder Root or Other Monitor System)
- This inspection consists of a system test.
- You must log this test Daily or Save Tape.





# Best Practices

## Stage I / II Air Quality

**KEEP THIS COMPLETED FORM FOR AT LEAST THREE YEARS ON SITE**  
**MONTHLY FUEL REPORT / DAILY INVENTORY**

Month/ Year \_\_\_\_\_

Facility & Location: \_\_\_\_\_ Registration Number: \_\_\_\_\_  
 Tank Size and Fuel Type: \_\_\_\_\_ Certified By: \_\_\_\_\_

Date	Opening Inventory (Book Inventory of Previous Day)	Gallons Pumped	Gallons Delivered	Book Inventory Balance	Closing Stick Inventory	Cumulative Over or <Short>	Inches Water	Initials
1								
2								
3								
4								
5								
6								
7								
8								
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Math Check		-	+	=				

Leak Check: Sum of Gallons pumped ( \_\_\_\_\_ ) x .01 = \_\_\_\_\_  
 IF SUM OF "CUMULATIVE OVER OR SHORT" IS GREATER THAN LEAK CHECK RESULT IT IS CONSIDERED  
 EVIDENCE OF A POSSIBLE LEAK AND YOU MUST NOTIFY DEP AT (207) 287-2651

- Keep track of Monthly Throughput
- Make sure total entered as soon as possible after figures come out.
- Stage I regulations change at 10k/mo and 100k/mo thresholds.

# Best Practices

## Stage II Daily Checklist

- Must be filled out everyday after inspection made.
- Must be signed off.
- This is an Air Quality rule.
- Your company/station can be fined if you do not fill this out daily





# Best Practices

## Daily Visual Inspections of Hanging Hardware



- Make sure there are no signs of damage. Holes, cracks or splits in hoses.
- Look for flattened hoses and signs of leaking at connections.
- Look at nozzle face seal, check nozzle locking mechanism for locking and releasing
- Check Break-a-way for signs of leakage

# Best Practices

## Benefits of Compliance Recap

- No penalty vs. Extreme Penalty
- Controlled Impact to Business
- Controlled Expense
- Control Environmental Impact



# Best Practices

## Non Compliance – What Can Happen?

### UST Penalties Assessed – Major Oil

- **November 2009** - CA state attorney general on Friday announced a \$19.5 million judgment requiring Shell Oil Co. and its affiliates to take immediate steps to improve spill monitoring, employee training and hazardous waste management at Shell gas stations in San Diego County and statewide
- **September 2008** – ExxonMobil Corporation settles with the state of MD for \$4 million for a release at one facility in Jacksonville, MD. Class action lawsuit by residents; jury awarded \$150 million in damages.



# Best Practices

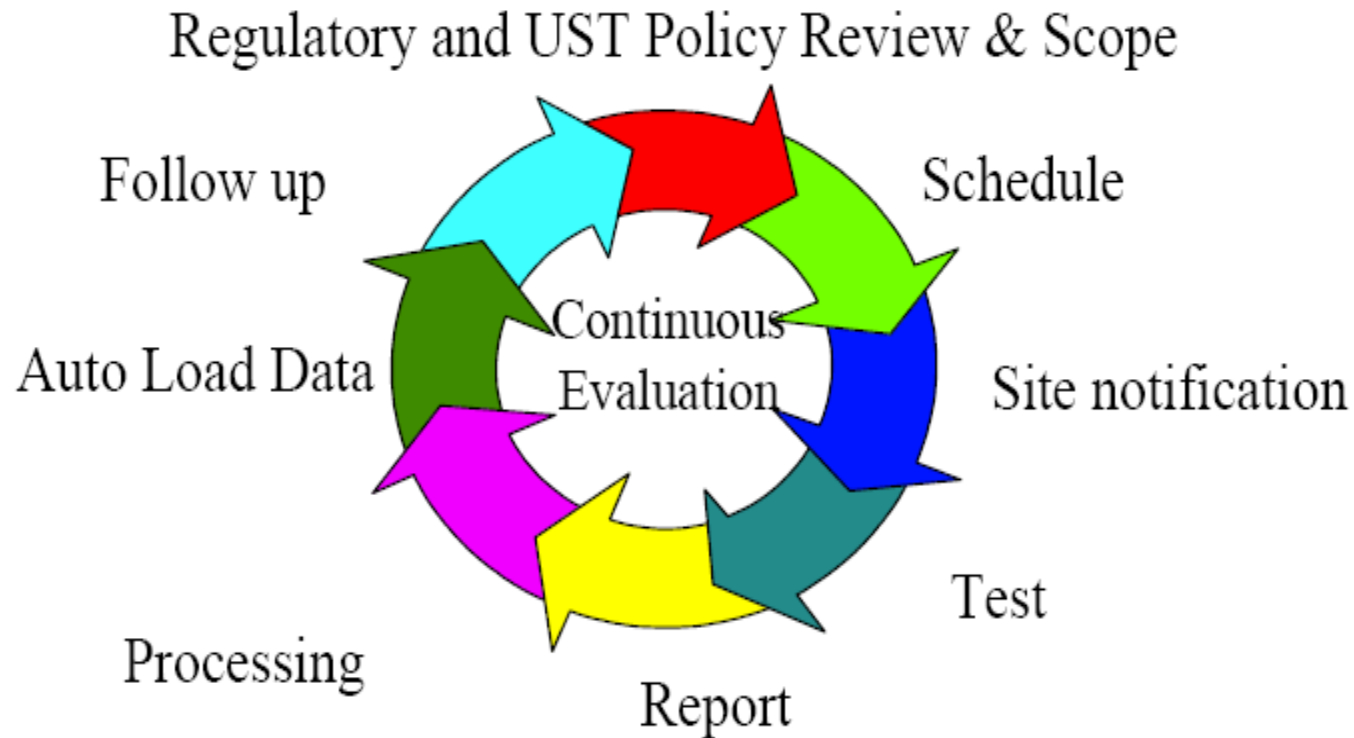
## Non Compliance – What Can Happen?

### UST Penalties Assessed – Independents

- **BOSTON** -- The owners and operators of a Berkley, Mass., gas station will pay a fine of \$10k after ignoring an order by the Massachusetts Department of Environmental Protection (MassDEP) to clean up gasoline contamination from an underground storage tank (UST) located on their property.
- **PITTSBURGH** – The Department of Environmental Protection has fined Billy Oil Co. \$63,100 for failing to meet the requirements of a July 2006 order that stemmed from an overfill at the company's gas station in Johnstown.

# Best Practices

## Tanknology's Compliance Management Model



# About Tanknology

**Tanknology Inc.** is the leading provider of fuel system compliance testing solutions in the United States. We provide compliance and inspection services to nearly 50,000 sites and 3,000 customer annually. We support a diverse customer base, ranging from large National oil companies, hypermarketers, and logistics companies, to regional distributors and single site owner/operators across 50 states.

## At A Glance

- Founded in 1988
- Tested over 1 million tanks
- Fleet of 130 service vehicles
- 8 Regional Offices Nationally
- Responsible for compliance management at over 13,000 sites nationwide.



# Our Services

- **Compliance Testing**
  - Tank Line and Leak Detector
  - Helium Leak Pinpointing
  - Aboveground Tank Testing
  - Secondary Containment Testing
- **ATG Certifications**
  - System Installations
  - Operational Verifications
- **Cathodic Protection Services**
  - Impressed Current Systems
  - Sacrificial Anode
  - Design, Installation and Repair
  - PetroScope™ Video Inspection
- **Stage I and II Vapor Recovery**
  - Testing (A/L, PD, etc.)
  - PVVC
  - Owner/Operator Training
- **Tank Deflection Analysis**
  - Proprietary Method





# Our Services (cont'd)

- **Fuel Pure™ Fuel Filtration**
- **Ethanol Preparation Services**
  - Bottom Sweep
  - Water Injection and Removal
- **Site Inspection and Audit Services**
  - State Required Inspections
  - Customized Surveys
  - Compliance Inspections
  - Maintenance Assessments
- **Online Operator Training**
  - Class C Operators
- **Site Upgrades/Light Construction**
  - Spill Bucket Replacement
  - Sump and UDC Repair
- **Meter Calibration**







*Thank you ...*

*Brad Walls*

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