TITLE:

ENV-301, UNDERGROUND STORAGE TANK (UST) MANAGEMENT PROGRAM

1. PURPOSE

The purpose of the Underground Storage Tank (UST) Program is to outline a method to comply with applicable Federal and State regulations regarding UST management at Emory University.

USTs are defined as tanks that contain a regulated substance such as petroleum and are located 10% or more beneath the surface of the ground. Emory University's USTs are regulated by the U. S. Environmental Protection Agency (EPA) and the Georgia Environmental Protection Division (GA EPD).

2. SCOPE

The UST Management Program applies to all USTs at Emory University, Emory Healthcare, and The Emory Clinic locations. Employees who have responsibilities regarding USTs must follow this program.

3. REFERENCES

3.1. Environmental Protection Agency: 40 CFR 280, 281, and 282
3.2. Georgia Environmental Protection Division: Georgia Rule 391-3-15
3.3. Petroleum Equipment Institute RP900

4. RESPONSIBILITIES

4.1. *Environmental, Health & Safety Office (EHSO)*

4.1.1. Provide oversight for the UST Management Program and for maintaining this written program in compliance with applicable regulations.
4.1.2. Maintain documentation associated with UST management.
4.1.3. Communicate or provide written notification to regulatory authorities as related to USTs.
4.1.4. Conduct annual audits of each UST site.
4.1.5. Provide training to UST operators.

4.2. *Directors, Supervisors, and Managers*

4.2.1. Manage operations of each UST in accordance with this program.
4.2.2. Notify EHSO of any changes to the UST system.
4.2.3. Maintain the appropriate documentation at the UST site and provide copies of documentation to EHSO.
4.2.4. Ensure contractors hired to service, install, or remove Emory USTs maintain a state or industry certification and obtain proof of that certification.

4.3. *Emory University Office of Risk and Insurance Services*

This Office will maintain an insurance policy that adequately covers Emory's environmental liability for USTs.

NOTE: Each UST is listed on the insurance endorsement.

4.4. *Employees*

Employees must comply with the rules set forth by this Program.

4.5. *Contractors*

Contractors must comply with Federal and State UST regulations.

5. REQUIREMENTS FOR UST INSTALLATION

5.1. Underground Storage Tanks may not be installed on Emory property without notifying EHSO and the appropriate facilities manager prior to installation.

5.2. New tanks must meet all EPA and GA EPD performance standards, installation, and notification requirements for new UST systems as specified in 40 CFR 280 Subpart B and GA Rule 391-3-15-.05.

5.3. Notification to GA EPD of UST installation must occur within 30 days of installation and will be coordinated through EHSO and either Campus Services Project Management Office or Healthcare Facilities Management.

6. REQUIREMENTS FOR ACTIVE USTS

6.1. *Registration and Certification*

6.1.1. EHSO registers USTs annually with GA EPD Land Protection Branch on or before September 1 each year.

- There is no fee associated with on-time registration.
- Late registration may incur a monetary penalty as determined by the GA EPD.
- Unregistered USTs are prohibited from receiving regulated substances such as diesel fuel.

6.1.2. GA EPD issues an Annual Tank Registration Certificate to the tank owner for each tank. The certificate is valid for the calendar year following registration.

6.1.3. Current certificates must be displayed in a conspicuous location at each UST site.

NOTE: Posting the certificate near the Automatic Tank Gauge would be considered a conspicuous location.

6.1.4. Certificates and registration forms must be maintained by EHSO for 3 years.

6.2. *Release Detection*

All USTs and certain piping systems must use an acceptable method(s) of release detection.

6.2.1. Automatic Tank Gauging

6.2.1.1. An Automatic Tank Gauge (ATG) tests for the loss of product and is one method of conducting inventory control and detecting releases.

6.2.1.2. If an ATG is available, it must be:

- Capable of detecting a leak at a rate of 0.2 gallons per hour.
- Used for inventory control.
- Calibrated annually according to the manufacturer's specifications.

6.2.1.2.1. Documentation of calibration must be maintained on-site for 3 years.

6.2.1.2.2. Copies of documentation must be provided to EHSO upon receipt.

6.2.1.3. The ATG will print a weekly record of the tank inventory and a leak test result.

6.2.1.4. One passing record per month must be kept to properly document UST monitoring. Documentation must be maintained on-site for 3 years.

6.2.1.5. If the ATG produces a failed test indicating a possible leak, see Section 6.8 on Release Reporting and Response.

6.2.2. Other Acceptable Methods

6.2.2.1. If no ATG is available onsite, another acceptable method of release detection must be used and documented. These methods include, but are not limited to, Inventory

Control, Manual Tank Gauging, Statistical Inventory Reconciliation, and Interstitial Monitoring.

6.2.2.2. Each of these methods has their own frequency and recordkeeping requirements found in 40 CFR 280.43.

6.2.3. Pressurized Piping Release Detection

All pressurized piping systems must be equipped with an automatic line leak detector.

6.3. *Tightness Testing*

6.3.1. All USTs must have an annual tank tightness test.

6.3.2. Line tightness testing must be conducted:

6.3.2.1. Every year on pressurized piping systems.

6.3.2.2. Every 3 years on suction piping systems.

NOTE: Line tightness testing is not required on safe suction piping systems.

6.3.3. All UST tank and line tightness testing documentation must be kept on-site for 3 - 6 years depending on the frequency of the test.

6.3.4. Copies of documentation must be provided to EHSO upon receipt.

6.4. *Corrosion Protection (Applies to steel tanks only)*

6.4.1. All steel USTs must have a cathodic protection system.

6.4.2. The cathodic protection system must be tested every 3 years in accordance with The National Association of Corrosion Engineers Standard RP-02-85 as noted in 40 CFR 280.31(b)(2) or an equivalent standard developed by a nationally recognized association.

6.4.2.1. Documentation of the last 2 inspections must be maintained on-site. The record retention time is 6 years.

6.4.2.2. Copies of documentation must be provided to EHSO upon receipt.

6.4.3. Steel tanks with an impressed current cathodic protection system must also be inspected every 60 days to ensure that the equipment is working properly.

6.4.3.1. A written log of the inspection results must be maintained on-site.

6.4.3.2. A minimum of the last 3 inspections must be retained for documentation.

6.5. *UST Repairs and Upgrades*

6.5.1. UST repairs must be made to prevent potential releases due to structural failure or corrosion of tanks and piping.

6.5.2. Repairs must be conducted in accordance with one of the industry standards listed in 40 CFR 280.33(a) or by the manufacturer's specifications.

6.5.3. Repaired tanks and piping must be tightness tested within 30 days of completion of the repair.

6.5.4. If the repair is to a cathodically protected UST system, the cathodic protection system must be tested within 6 months of the repair.

NOTE: This testing is in addition to the tightness testing requirement in 6.5.3.

6.5.5. Records of any UST repairs, upgrades, and follow-up testing to prove compliance with the above requirements must be maintained for the remainder of the UST system operating life.

6.5.6. Copies of documentation must be given to EHSO upon receipt.

6.6. *Filling Operations & Spill Prevention*

6.6.1. The UST must be filled with the substance that is registered with the GA EPD and that substance must be compatible with the tank materials and equipment.

NOTE: USTs that contain diesel may be incompatible with biodiesel. Notify EHSO well in advance of any plans to switch product.

6.6.2. A Class A, B, or C certified operator (see Section 8) from Emory must be physically present during filling operations to ensure that overfilling or spilling of the product does not occur. The operator must ensure that:

6.6.2.1. The volume of product being transferred during a filling operation does not exceed 95% of the available volume in the tank before the transfer is made.

6.6.2.2. There is no obstruction inside the fill pipe.

6.6.2.3. Any spilled or overfilled product is cleaned up immediately and reported to EHSO.

NOTE: Spill debris must be properly disposed of through EHSO.

6.6.2.4. The fill cap seals tightly and is in good condition.

6.6.3. Each UST must have a spill prevention bucket around the fill pipe. The bucket should prevent the release of product to the environment when the transfer hose is detached from the fill pipe.

6.6.3.1. The bucket must hold a minimum of 5 gallons.

6.6.3.2. The bucket must be kept free of debris and water, and be in good repair.

6.6.3.3. Any water that accumulates in the bucket must be emptied regularly to maintain adequate spill prevention capacity.

6.6.3.3.1. The water may be released to the environment if there is no visible sheen.

6.6.3.3.2. If there is a sheen on the water, contact EHSO to clean up the oil before releasing the water.

6.6.4. Each UST must have a droptube fitted with a flapper valve for overfill prevention. The flapper valve should be designed to shut off flow into the tank to prevent an overfill.

6.6.5. Tanks must not be filled over 95% of the total capacity of the tank. Tanks filled to over 95% capacity must have the product overage removed from the tank and disposed of properly. Product disposal must be coordinated with EHSO.

6.6.6. Appropriate spill response materials such as absorbent or spill pads should be readily available.

6.7. *Spill Response and Reporting*

6.7.1. Spills and overfills must be immediately contained and cleaned up. EHSO should be contacted for assistance with spill cleanup.

6.7.2. Spills must be reported to GA EPD within 24 hours if any of the following conditions occur:

6.7.2.1. If the spill exceeds 25 gallons.

6.7.2.2. If the spill will cause a sheen on nearby surface water.

6.7.2.3. If the spill is less than 25 gallons, but will take longer than 24 hours to cleanup.

6.7.3. The GA EPD may require a corrective action plan to be completed in accordance with 40 CFR 280 Subpart F and GA Rule 391-3-15-.09.

6.8. *Release Reporting & Response*

6.8.1. A potential release must be considered when:

6.8.1.1. There is free product or vapors in nearby soils, basements, utility lines, or surface water.

6.8.1.2. There are unusual operating conditions that cause erratic dispensing of product from the UST.

6.8.1.3. There is unexplained water in the tank.

6.8.1.4. The ATG or other inventory control method indicates a loss of product or produces a failed test result.

6.8.2. The potential release must be investigated within 7 days of discovery. Methods of investigation include tank and line tightness testing and confirmation that the ATG is working correctly.

6.8.3. Should a potential release be confirmed, Emory must complete the following actions within 24 hours.

6.8.3.1. Report the release to the GA EPD

6.8.3.2. Prevent further release to the environment. (i.e. remove the remaining product from the UST system.)

6.8.3.3. Mitigate any fire, vapor, or explosion hazards that may exist.

6.8.4. EHSO or its designee will respond to the release in accordance with 40 CFR 280 Subpart F and GA Rule 391-3-15-.09. Response measures may include repair or replacement of the UST system, the submission of a corrective action plan to the GA EPD, and remediation of the release site.

6.9. *Inspections*

6.9.1. A UST site's Class A, B, or C certified operator must inspect the site monthly using EHSO's *Underground Storage Tank Monthly Inspection Form*.

6.9.2. Inspection documentation must be kept on-site for 3 years.

6.9.3. Emory's EHSO will inspect the tank site annually (at a minimum) to ensure that the procedures outlined above are being followed using the *Underground Storage Tank Annual Inspection Form.*

6.9.4. The EPA and GA EPD have the right to inspect the tanks at anytime. USTs will be inspected by the GA EPD at least once every 3 years.

6.9.4.1. Notify EHSO immediately if inspectors arrive on-site. EHSO will accompany the inspector to help answer questions and produce requested documentation.

6.9.4.2. USTs found to be out of compliance by the EPA or GA EPD may be suspended from product deliveries.

7. REQUIREMENTS FOR UST CLOSURE

7.1. EHSO must oversee the closure of any Emory-owned UST in conjunction with a certified UST removal contractor.

7.2. Intent to close an UST must be submitted to the GA EPD at least 30 days prior to closure. Therefore, EHSO and the contractor must have appropriate lead time to ensure that the proper paperwork can be submitted to GA EPD.

7.3. The contents of the UST system must be removed.

7.4. The UST system must be removed from the ground or filled with an inert material.

7.5. The site must be assessed for possible contamination. If contamination is found, the site must be remediated in accordance with 40 CFR 280 Subpart F and GA Rule 391-3-15-.09.

7.6. A closure report must be submitted to the GA EPD within 45 days of completion of closure.

7.7. Closure records will be maintained by EHSO for at least 3 years.

8. TRAINING

Each UST or group of USTs must have certified Class A, B, and C tank operators.

8.1.1. Class A Operators:

8.1.1.1. Are typically the Facilities Director or a representative from EHSO.

8.1.1.2. Have primary responsibility to operate and maintain the UST system in compliance with regulatory requirements.

8.1.1.3. Must pass the Georgia UST Operator Examination upon initial assignment and every 7 years thereafter.

8.1.2. Class B Operators:

8.1.2.1. Are typically the Zone Supervisor, Facilities Manager, or a representative from EHSO.

8.1.2.2. Implement regulatory requirements in the field and are generally in charge of day-to-day operations.

8.1.2.3. Must pass the Georgia UST Operator Examination upon initial assignment and every 7 years thereafter.

NOTE: Class A & B Operators may be the same person.

8.1.3. Class C Operators:

8.1.3.1. Are responsible for initial response to alarms, spills, or releases.

8.1.3.2. Must be trained upon initial assignment by a Class A or B operator.

8.1.3.3. Retraining should occur as needed to maintain compliance.

8.1.4. Should any certified operator vacate their position, the operator must be replaced with an equivalent UST operator within 60 days or operations must cease.

8.1.5. Retraining may be required if the UST site is found to be out of compliance by GA EPD or EPA.

8.1.6. Documentation of certification must be maintained on-site.

8.1.7. Copies of documentation must be provided to EHSO upon receipt.

9. RECORD KEEPING

Requirements are specified under the applicable heading (refer to sections 6, 7, and 8).

GLOSSARY

Release	Any spill, leak, emission, discharge, escape, leach, or disposal from a UST system into groundwater, surface water, or subsurface soils.
Spill	Any spill occurring to the surface above a UST usually occurring from overfilling of the tank or a problem during product transfer.
Active UST	A UST assumes this status after installation. The tank is typically operational and/or contains product. The UST has not been closed through notification to the State of Georgia Environmental Protection Division.