Safe Operating Procedure

(Revised 3/14)

UNDERGROUND STORAGE TANKS – PERMITS AND NOTIFICATIONS

At UNL, Underground Storage Tanks (USTs) are used solely for fuel storage. Certain USTs are subject to regulations that, in part, require permits. Some UST systems associated with Gasoline Dispensing Facilities may also require filing of a notification and, in some cases, certification of compliance with the EPA and local air permitting authority. The purpose of this SOP is to provide an overview of notification processes and applicable permits.

UST Permits

Permits are required for installation, operation, and closure. Permits are issued by the UNL Building Code Official. Each type of permit is discussed below.

- Installation Permits
  Installation permits are required for all new tank and replacement tank installations and piping installations or replacements in which more than 10% or 10 feet (whichever is less) of the product lines are being replaced. An installation permit must be obtained at least 10 days prior to beginning installation. Copies of issued permits should be maintained in the on-site tank files and forwarded to EHS.

- Temporary Operating Permits
  A temporary operating permit is automatically issued following submittal of an installation permit application. The temporary operating permit is valid until completion of an initial UST inspection confirming that the UST meets all state requirements, after which a permanent operating permit will be issued.

- Permanent Operating Permits
  Conditions of the permanent operating permit must be observed at all times. Deviations from permit conditions must be reported to EHS by the operator. Examples of general operating permit conditions include:
    - Operators must ensure that releases due to spills or overfilling do not occur, and verify that available capacity in the tank is sufficient prior to filling.
    - Corrosion protection systems must be continuously operated and maintained, if applicable.
      - Impressed current systems must be inspected every sixty days. Testing must be conducted within six months following repair and annually by a certified contractor. Records of inspection and testing must be maintained for six months and two years, respectively. These records are to be maintained by the operator.
      - Galvanic or sacrificial anode cathodic systems must be tested at least every three years and within six months following repair by a certified contractor. Test records must be maintained for six years. These records are to be maintained by the operator.
    - Records of all repairs to an UST system must be maintained for the life of the system. These records are to be maintained by the operator. Repairs to

fiberglass systems must be conducted by an authorized representative of the manufacturer. Other repairs must be made in accordance with the manufacturer's specifications. Generally, repaired tanks and piping must be tested for tightness within 30 days following repair.
    - If the UST system does not include an automatic release detection system (i.e., vapor monitoring, interstitial monitoring, automatic tank gauging, etc.), then manual tank gauging or daily inventory control procedures must be observed.
- In addition to general permit conditions, operating permits may also contain site-specific requirements and references to other applicable NFPA codes and/or standards. Examples of commonly cited NFPA requirements include:
    - Availability of emergency shut-off valves inside and out for fuel dispensing locations.
    - Wiring that is approved for hazardous locations.
    - Fuel dispensers in clear view of the attendant.
    - Liquid tight fuel connections and caps.
    - Postings and signs, such as "No Smoking" and emergency contact information.
    - Availability of emergency communication devices (i.e., telephone).
    - Availability of fire extinguishers.

- Closure Permits
  Closure permits are required for non-exempt UST or piping removals or closures-in-place. At least 30-days prior, notice of intent to permanently close or initiate a change in service must be made to the UNL Building Code Official. A closure permit must also be obtained. Following closure, a closure assessment and report and certification of compliance must be completed and submitted to the UNL Building Code Official by the tank contractor within 45 days of the closure. Copies of the assessment and report and certification should be maintained on-site in the tank files and forwarded to EHS. If contamination is encountered during the removal process, suggesting a prior release, notification must be made to the UNL Building Code Official and NDEQ within 24 hours of discovery. Contact EHS immediately. EHS will notify regulatory authorities and advise on nature and scope of remedial activities to be completed at the time of discovery. See the related EHS SOP, ***Underground Storage Tanks – Closure Requirements*** for more details regarding the closure process and procedures.

EPA Clean Air Act Notification/Certification of Compliance

Gasoline Dispensing Facilities (GDF) that have an average total monthly throughput (total combined from all ASTs and USTs) of 10,000 gallons or more may be required to file an initial notification with EPA. This notification must be filed within 15 days of installation or reconstruction. Facilities with throughputs of 100,000 gallons or more have additional reporting obligations. Facilities that do not meet the notification thresholds must produce documentation supporting throughput claims upon request by the EPA. Contact EHS for further information/guidance.