Safe Operating Procedure

UNDERGROUND STORAGE TANKS – PETROLEUM RELEASE REQUIREMENTS

Leaks and releases of petroleum from Underground Storage Tank (UST) systems, whether historical or current, may present a hazard to the environment, public health and safety, and/or facilities. For example, gasoline vapors from a leaking UST system can accumulate in nearby basement structures or utility tunnels creating explosive atmospheres or inhalation exposures. Leaking petroleum can contaminate ground or surface waters. Because of these hazards, certain releases must be reported to regulatory authorities.

The purpose of this SOP is to summarize regulatory reporting requirements for leaks and releases of petroleum products from UST systems.

Reporting Requirements
Releases from UST systems may be onto or beneath the surface of the ground. All actual and suspected releases must be reported to EHS. Releases to the surface of the ground in a quantity greater than 25 gallons must be reported to the Nebraska Department of Environmental Quality (NDEQ) and UNL’s Building Code Official (authority of the State Fire Marshal has been delegated to UNL’s Building Code Official). Releases or suspected releases of any quantity of petroleum beneath the surface of the ground or that threatens or has reached waters of the State must be reported to the NDEQ and UNL’s Building Code Official. In some cases, the National Response Center (NRC) may also need to be notified.

EHS is responsible to make all notifications to regulatory authorities, coordinate and plan remediation activities, and file follow-up reports. However, the tank operator or any other person who discovers a release is responsible to notify EHS immediately. If EHS cannot be reached, contact NDEQ and UNL’s Building Code Official and follow-up with EHS as soon as possible.

The above requirements apply to actual releases (i.e., obvious overfills, spillage from dispensing equipment, etc.) and suspected releases (i.e., monitoring devices indicate that a release may have occurred, erratic behavior of dispensing equipment, unexplained presence of water in the tank, etc.). However, reporting is not required if:

- It is found that monitoring equipment is defective and it is immediately repaired, recalibrated or replaced, and additional monitoring does not confirm a release; or,
In the case of inventory control, a second month of data does not confirm a release.

Emergency Procedures
Following are procedures to be followed by the tank operator in the event of a release to the surface of the ground:

1. Take action to stop the spill/release if it is continuing (i.e., close valves, activate emergency shut-offs, etc.).
2. Take action to prevent the spill/release from entering sewers, streams, and spreading to other adjacent areas. Such action might consist of creating a berm or dam with spill response materials such as bags, socks, or granular absorbent, and blocking sewer inlets with mats or berms.
3. If the spill is small and does not present an immediate hazard to property, personnel, or the environment:
   a. Spread absorbents (loose granular material, pads, or pillows) over the surface of the spill working from the perimeter of the spill to the center.
   b. Call EHS at (402) 472-4925 during normal business hours or by dialing the Campus Operator at “0” after hours.
4. If the spill poses an immediate threat to property, personnel, or the environment, immediately dial “911” to summon outside emergency responders.
5. Remain in the immediate vicinity until EHS personnel have arrived on-site and relieved you from duty.
6. All spill response material must be segregated and containerized. Do not mix spill pads and pillows with granular absorbent, etc. Do not mix contaminated disposable personal protective equipment (i.e., gloves, shoe covers, coveralls, etc.) with other spill response clean-up debris. Do not mix contaminated soils with anything else.
7. EHS will generally advise removal of visibly contaminated surface soils and replacement with clean soils. EHS will advise on additional excavation on a case-by-case basis. Releases beneath the surface of the ground generally will require UNL to conduct a contamination assessment, but the timing of the assessment is at the discretion of NDEQ. In some cases, NDEQ does not order a contamination assessment for years after the event. In this case, the site is usually referred to as a “back-logged” site.