

**UNDERGROUND STORAGE TANKS – SUMMARY OF
 RECORDKEEPING REQUIREMENTS**

(For assistance, please contact EHS at (402) 472-4925, or visit our web site at <http://ehs.unl.edu/>)

The purpose of this SOP is to summarize recordkeeping requirements related to Underground Storage Tanks (USTs).

Records Required by EPA’s Spill Prevention Control and Countermeasures (SPCC) Regulations

Table 1 summarizes records that must be maintained in accordance with UNL’s SPCC Plans. These requirements apply to the City Campus Utility Plant USTs since they are not fully regulated under Title 159. UNL’s written SPCC Plans contains additional information and record-keeping forms.

TABLE 1 – SPCC Recordkeeping Requirements (5 year Record Retention)		
Record Type	Description	Generation and Maintenance
Visual Integrity Inspection	As applicable, check all visible portions of the UST system including fuel lines, pumps, pump houses, secondary containment structures, etc. Inspect for corrosion, damage and leaks.	Annual inspection conducted by EHS with records maintained in the EHS Office, AND ; Monthly inspections by the UNL UST operator with records maintained in the onsite tank files, AND ; Any time the lines or other parts of the UST system are uncovered (i.e., repair), with records maintained in the onsite tank files.
Spill Kit Inspections	Evaluation of the amount and integrity of spill supplies.	Annual inspection conducted by EHS with records maintained in the EHS Office, AND ; After use inspections conducted by UNL UST operators, with records maintained in the onsite tank files.
Container/Tank Area Inspection	Inspection of the area around USTs for security, lighting, record keeping, etc.	Annual inspection conducted by EHS with records maintained in the EHS Office.
Fuel Transfers	Each loading/ unloading event must be documented.	Inspections are conducted by the UNL UST operators, with records maintained in the onsite tank files.
Training	Training is commensurate with assigned duties and is predominately provided at the department level.	Training is required at the following frequencies: initially; in response to spill events or failures; when the SPCC plan changes significantly or fails in the event of an emergency; when, through observation of work practices, it is apparent that an individual is in need of more training; and annually. Unless specifically requested by the operator of a plan, initial and annual training is conducted on-line and records maintained by EHS. Otherwise, records are maintained by the department.
Releases/Spills	See Table 2	

Records Required by NDEQ's Release/Spill Regulations

Table 2 summarizes records that must be maintained in accordance with Nebraska Title 126, Chapter 18 and/or Title 200, *Petroleum Release Remedial Action Reimbursement Fund*. These requirements pertain to all UST systems at UNL.

TABLE 2 – NDEQ Release/Spill Recordkeeping Requirements		
Record Retention: Until the UST system is permanently taken out of service, removed, clean-up actions (if applicable) are completed, and Title 200 reimbursement (if applicable) is received		
Record Type	Description	Generation and Maintenance
Notification(s) of releases	Immediate verbal notification to NDEQ & SFM for any release of fuels/ oils below the surface of the ground; any release to a storm sewer or other surface water; any release that poses a danger to humans; and any release outside of a building of 25 gallons or greater.	EHS will make the verbal notification. No specific document is required for verbal notification; however, a record of the telephone call should be made. EHS maintains the record.
Follow-up reports to notifications of releases	A formal, written report as described in Nebraska Title 126, Chapter 18 describing the events that caused the release; the volume and type of material released and actions taken to clean up the release and to prevent it from happening again.	EHS submits the written report as described in the regulations. The normal time-frame for submittal is within 15 days of the release. NDEQ may require additional reports depending on the nature and duration of the cleanup. EHS maintains the record.
Remedial design plans	These plans are generally prepared to describe activities that will be taken to reduce the long-term environmental impact of a release (i.e., source removal, free product removal, etc.).	Remedial design plans are generally prepared by consultants, under the direction of EHS. They are filed with NDEQ and must be pre-approved by the agency to retain eligibility for Title 200 reimbursement. EHS maintains the record of the plan.
Remedial action reports (including analytical results)	These reports are the product of a remedial design plan and describe the progress in cleaning up a release.	EHS reviews the work product of a consultant/engineer/contractor for completeness and submits the report to NDEQ. EHS maintains a copy of the report.
Title 200 reimbursement requests (including financial records)	In some cases, UNL may be eligible for reimbursement of a portion of the costs for responding to releases from USTs.	EHS or the consultant/engineer/contractor working on UNL's behalf prepares the documents describing the work done and costs associated with it. EHS maintains a copy of the submittal and response from NDEQ.

Records Required by SFM UST Regulations

The following records must be maintained in accordance with Nebraska Title 159 for those UST systems at UNL subject to these regulations. All UST systems at UNL, except Cather/Pound/Neihardt, are subject to all or part of these regulations.

TABLE 3 – SFM UST Recording Keeping Requirements			
Record Type	Description	Generation and Maintenance	Record Retention Time
Permits and Registrations (See EHS SOP, <i>Underground Storage Tanks – Registrations, Permits, Notifications and Fees</i> for a list of UST systems that are subject to installation and closure permits and registration)			
Installation and Operating	Application is made prior to installation;	The contractor submits the application and provides copies to	Operating permit must be maintained until the

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Permits	permit issued by SFM.	FMP and EHS.	system is permanently taken out of service.
One-time registration forms	Farm, residential, heating oil tanks with a storage capacity of less than 1,100 gallons, and permanently abandoned tanks.	FMP and/or owner department.	Until the UST system is permanently taken out of service and notice is filed with the SFM.
Annual registration forms	All other USTs not described above for one-time registration.	The SFM generates the billing forms and mails them to the operator.	For one year, or until the next annual fee is paid.
Closure permits	The permit is issued when the SFM approves the intent to close request. The permit must be obtained at least 10 days prior to closure.	The SFM generates the permit. A copy must be forwarded by the contractor to EHS.	Until closure is complete and Title 200 reimbursement (if applicable) is received.
Closure assessment reports	This report describes the actions taken to remove an UST or any part of the system from operation.	The contractor, working on behalf of UNL, generates the report and is responsible to provide EHS with a record copy.	Until closure is approved by NDEQ and Title 200 reimbursement (if applicable) is received.
Integrity and Leak Testing/Inspection: Requirements vary depending on the type of UST system. Refer to the EHS SOP, <i>Underground Storage Tanks- Summary of Regulatory Requirements</i> .			
Inspection reports for impressed current systems (fully regulated tanks only)	Record of tests performed to determine if the system protecting the UST from corrosion is working properly.	The UST operator generates the record at least once every 60 days. The UST operator maintains the record.	6 months
Testing of impressed current systems (fully regulated tanks only)	A certified contractor must test the impressed current system.	A qualified contractor conducts the test. The record is maintained by the operator.	2 years
Testing of galvanic or sacrificial anode cathodic systems (fully regulated tanks only)	Record of tests performed to determine if the system protecting the UST from corrosion is working properly.	A qualified contractor conducts the test once every 3 years. The UST operator maintains the record.	6 years
Records of repair to any parts of the UST system (all UST systems, except those that are exempt)	Any repair to any part of an UST system must be documented. Note that any repair to tanks or lines must be followed by a tightness test.	A qualified contractor completes the work. The UST operator maintains the record.	Until the UST system is removed.
Inventory Control/Tank Gauging Records (all UST systems,	Monthly tank gauging records to demonstrate that the system is not leaking.	Monthly test by the UNL UST operator with records maintained in the on-site tank files.	5 years

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except exempt)			
Written performance claims	Pertaining to any release detection system used, and the manner in which these claims have been justified or tested by the equipment manufacturer or installer	The contractor installing the equipment furnishes the documentation to the UST operator. The UST operator maintains the record.	5 years from the date of installation though EHS recommends they be maintained for the life of the system.
Tank tightness testing records	This documentation is for the detection of releases.	A qualified contractor generates the report. Testing is required prior to the beginning of operation of any UST and following repairs. The UST operator maintains the record.	Until the UST system is permanently taken out of service.
Calibration and Maintenance records	Records of manufacturer's scheduled calibration and maintenance of release detection equipment permanently located on-site.	Installation/testing/calibration by a qualified contractor. The UST operator maintains the record.	5 years from the date of installation.
SFM regulatory inspection reports/orders and subsequent follow-up correspondence	This report is the result of periodic SFM inspections.	The SFM generates the record and EHS working with the UST operator generates the response(s). Operators must forward a copy of the inspection report to EHS.	5 years

Records Required by EPA Clean Air Act Regulations

Records must be maintained that demonstrate the amount of fuel loaded (or dispensed) during the past 365 days in each UST system that is used to dispense gasoline into motor vehicles. These records must be available for the past three years. These records are subject to review by EPA upon request.