



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION



Bureau of Environmental Cleanup & Brownfields

Storage Tank Advisory Committee Meeting

Harrisburg, PA
June 7, 2016



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Conceptual Revisions to Chapter 245

Kris Shiffer

Storage Tank Advisory Committee

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▶ PA Chapter 245 Regulation Changes

245.1** Certification

- **Add a new certification category for UST Minor Modifications.**
- **Lessen the number of activities needed for UMX certification.**

▶ PA Chapter 245 Regulation Changes

245.2** Permitting

- **No changes as to when an SSIP is required.**
- **Addition of > 21,000 gallons of aggregate capacity when installing all small ASTs at an existing AST facility will not require an SSIP.**

▶ PA Chapter 245 Regulation Changes

Who can do what activity:

New Operation and Maintenance Requirements

- **Periodic walkthrough inspections**
 - Maintenance (owner/operator)
 - Visual inspection of spill buckets (clear of debris, etc.) and release detection every 30 days
 - Visual inspection of sumps and handheld release detection devices annually

PA Chapter 245 Regulation Changes

Who can do what activity:

New Operation and Maintenance Requirements

- **Three-year overfill prevention equipment inspections**
 - UMX or New certification category
- **Three-year containment sump AND spill bucket testing**
 - IUM, UTT, UMX, or New certification category
- **Failures would be required to be reported to DEP on DEP Testing Form**
 - Add requirement to § 245.132 (Standards of performance)
 - Report failures within 48 hours
- **Annual release detection equipment testing**
 - Manufacturer-authorized training that certifies the individual or UMX or New certification category
 - Includes Line Leak Detectors (mechanical and electronic)

▶ PA Chapter 245 Regulation Changes

New Operation and Maintenance Requirements

Phase-in Periods

- **Monthly walk-through inspection**
 - 1 year from effective date
- **Three-year overflow prevention equipment inspection, spill bucket testing, and containment sump testing**
 - 1 year from effective date, then phased-in
 - Regulations become effective on Day X; after 1 year, testing must be completed prior to the next FOI due date or 3 years from Day X, whichever is sooner
- **Annual release detection equipment testing**
 - 1 year from effective date

PA Chapter 245 Regulation Changes

New Operation and Maintenance Requirements

Phase-in Periods

- **Emergency Generator (EG) Release Detection**
 - For any EG tanks installed after the effective date, release detection requirement would be immediate
 - For Total Secondary Containment EG tanks installed prior to effective date, must perform release detection within 1 year from effective date
 - For EG tanks that do not have Total Secondary Containment (some type of single-walled portion exists), must perform release detection within 2 years from effective date

PA Chapter 245 Regulation Changes

245.5** Large Aboveground Storage Tanks

- **Initial concept: replace “monthly visual inspections” with “visual inspections at least once every 30 days.”**
 - Since we are requiring 72-hour checks to be documented, retain current language
- **Add timeframe for owner to submit updated SPRP**
 - 120 days
 - SPCC requires implementation “as soon as possible” and amendments within 6 months
 - PPC requires amendments immediately



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Questions?