



Bureau of Environmental Cleanup & Brownfields

Administrative & Underground Storage Tank Inspector Seminar



Tom Wolf, Governor

Patrick McDonnell, Secretary

What to Expect Today

- Underground Inspector (IUM) Information
 - Facility Operations Inspection (FOI) Report Completion
 - Compliance Evaluations
- Administrative Information
 - Document Completion & Submission
 - Reporting Requirements
 - Registration & Permitting
 - Certification Applications & Renewals

▶ Whom Should I Contact with Questions

USTs – FOIs, Modifications, and Testing Forms

Cheryl Malloy (Mauch)	717-772-5803	Regions 1 & 2
Kalynn Conner	717-772-5825	Regions 3 & 4
Chantelle King	717-772-5806	Regions 5 & 6
Ashley Grace	717-772-5821	

ASTs – Inspections and Modifications

Magen Majeski	717-772-5810	Regions 1, 3, 5
Susan Nealy	717-783-9767	Regions 2, 4, 6

Tank Registration and Permitting

Eric Lingle	717-783-2403	
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Tank Handler and Inspector Certification

Anne Toth	717-772-5808	
Wendy Davis	717-772-5829	

Underground Inspector Information

The Facility Operations Inspection (FOI)

Proper FOI Report Form Completion

Missed Sections	Comments
Flammable & Combustible Permits	Manufacturer and Model
ICCP Records	Code 99 & Unknown Piping Connectors
Historical Records	Missing Months of Release Detection
Modification Report Review	Suction Systems & Release Detection

FOI Compliance Evaluations

Walkthroughs	Periodic Testing
Corrosion Protection	Release Detection
Unknown Components	Financial Responsibility

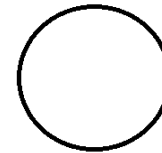
Successful FOI Reports

Creating FOI reports that communicate effectively with DEP and your customer:

- Make sure all DEP forms are complete prior to distribution.
- When completing an FOI:
 - Provide detailed comments
 - Complete the checkboxes correctly
 - Check box when criteria is met
 - For an unmet criteria, circle the box
 - If N/A, circle box and write N/A
 - If the page is blank, include in submittal and write “nothing on page” if need be
- Please make sure to respond to any inquiries made by the DEP, post submission, in a timely manner.



Compliant



Non-Compliant



Not Applicable



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

FOI Reports – Missed Sections

Flammable & Combustible Permits

- Almost all USTs regulated by DEP will require a Flammable & Combustible Permit:
 - If owner cannot readily produce a Fire/Safety permit, mark **No and explain in detail in the comments section of the FOI (page 8).**

Fire/safety permit(s) available (if required)

Yes

No

N/A

Fire/Safety Permit Number(s) _____

Issued By _____

- Owners may inquire about the existence of a Fire/Safety Permit by emailing a written request to boilers@pa.gov
 - Will need: Storage tank owner name, facility name, facility address, and DEP facility ID number.

In All Cases

The FOI Report form should be received by DEP within 60 days of the first site visit.

*Note: email correspondence was sent to DEP-certified individuals addressing this issue on October 22, 2020.

FOI Reports – Missed Sections

Impressed Current Cathodic Protection (ICCP)

- FOI Reports for USTs with ICCP systems are frequently incomplete.

There is more than just rectifier output readings!

The Highlighted sections below are most frequently missed.

- Galvanic and Impressed Cathodic Protection
- Impressed Current Design and Rectifier Output
- If Cathodic Protection or supplemental anodes were added to an existing tank system, fill in the following (Information is Required for Compliance)



If Cathodic Protection or supplemental anodes were added to an existing tank system, fill in the following (Information is Required for Compliance):

Date assessed: _____

Date installed: _____

Assessment Method: _____

FOI Reports – Missed Sections

Historical Records:

records documenting the underground tank system installation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
records documenting underground tank system modification and upgrade activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Modification Reports (if more room is needed, please continue the chart in the comments section):

date of modification report	tank system component(s) impacted	certified tank handler	tank systems modified				
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Historical Records & Modification Report Review

Reminder: There are no **OPTIONAL** sections of the FOI Report form.

N/A and appropriate comments should be used for all sections that do not apply to the facility you are inspecting.

1. DEP frequently identifies Modification Reports that have not been received and reviewed because of the detail provided on FOI Reports.
2. The IUM documenting what Modification Reports were provided can help clarify discrepancies in expected compliance standards.
 1. **For Example**: Piping replacements after 11/10/2007. An IUM that is not provided the modification reports will not be aware of the interstitial monitoring requirement. By reporting on Modification Reports provided, the IUM shows this is a recordkeeping error by the facility, NOT a compliance determination mistake by the IUM.

▶ FOI Reports – High Quality Comments

Page 8: Comments

Tank Manufacturer		Tank Construction (i.e. Double-walled Act 100 with Anodes)	
Piping Manufacturer		Piping Model/Brand	Piping Generation (if applicable)

Reminder: There are no **OPTIONAL** sections.

DEP requests that IUMs document applicable tank and piping manufacturer and model information on ALL inspections.

If it is unknown, any supporting details uncovered during the investigation should be provided.

Nationally Recognized Standards

Attention Inspectors, Installers, and periodic testers!

“Industry Standard”

This phrase is used as shorthand frequently by the DEP reviewers and regional inspectors.

It **DOES NOT** mean what has been done for the last few decades **OR** how you have always done the particular activity in question.

What it **DOES** mean is following a code of practice developed by a nationally recognized association or independent laboratory. For example, PEI RP 1200 for testing of Spill Prevention Equipment

This applies to all areas in your interactions with DEP:

Installations	Modifications
CP Evaluations	All Periodic Testing

Nationally Recognized Standards

“Industry Standard”

Why is this note inserted into the middle of our discussion about Inspections?

§ 245.411. Inspection frequency.

*(a) Inspection of underground storage tank systems. Underground storage tank owners or operators shall have their underground storage tank systems inspected by a certified inspector at the frequency in subsections (b) and (c). The inspection shall include release detection, **assessment of the underground storage tank system and ancillary equipment**, operation of overflow and spill prevention equipment where practicable, corrosion protection testing, or verification that corrosion protection is functional, and release prevention measures.*

DEP expects the IUM to assess both during physical inspection and record review that the UST system meets the regulatory requirements including adherence to manufacturers’ installation requirements and/or the appropriate code of practice developed by a nationally recognized association or independent laboratory

FOI Reports – High Quality Comments

- DEP is looking for clarification on if piping is true double-walled piping for flex piping.
- Manufactured **single-walled piping put inside a chase is not considered valid** for using interstitial monitoring
 - Environ piping must be Geoflex-D or Geoflex-M. Geoflex-S in any of their Geoducts is not acceptable.
 - Total Containment single-walled Enviroflex piping in a chase is an exception but should be evaluated on a case-by-case basis. IUMs should mark the piping noncompliant if it is not properly capable of performing interstitial monitoring.



FOI Reports – High Quality Comments

tank release detection records for the last 12 months the system contained product are available	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
tank release detection records are all valid and passing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
tank release detection records with invalid or failing reports were properly investigated and documented within 7 days, to confirm or disconfirm the occurrence of a release	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
written certifications or performance claims for the tank release detection method(s) in use are available	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
written documentation of all calibration, maintenance and repair of tank release detection equipment for the last year is available	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
all tank release detection equipment is compatible with the substance stored	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Missing, Invalid, Failing Release Detection

- If less than 12 months of valid and passing release detection results are available:
 - Provide comments on Page 8 with additional detail:
 - Results of interview with Class A or Class B Operator. Did you determine if the release detection was a measurement issue, a recordkeeping issue, or a misunderstanding of the equipment?
 - Did you retrain the Operator?
 - Any actions taken to investigate the failing, invalid or missing release detection.
 - The results: passing, failing, invalid, or missing for each of the past 12 months.
 - **Please Note:** DEP has specific follow-up criteria based on the What and When of noncompliant release detection.

➤ FOI Reports – High Quality Comments

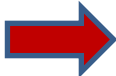
European (Safe) Suction

- A form of documentation is needed as proof - owner's word is not good enough!
 - It must be verified by documentation or physical inspection.
- Explain in remarks how it was determined
- Verify piping slope
 - Installer verified (physical documentation)
 - As built drawings & pictures
 - Observing a check valve only under the dispenser

Exempt Suction System: (SUCTION piping only – code I)

NOTE: No further release detection required on piping meeting all these criteria.

the tank top is lower than the suction pump inlet	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
the below grade piping slopes uniformly back to the tank	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
there is no more than one check valve in the piping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
the check valve is located close to or inside the suction pump	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
compliance with above specifications can be readily determined; describe below:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
compliance is determined by: _____					



FOI Compliance

The Facility Operations Inspection (FOI)

FOI Compliance Evaluations

Walkthroughs	Periodic Testing
Corrosion Protection	Release Detection
Unknown Components	Financial Responsibility

Walkthrough Inspections

Monthly periodic walkthrough inspections are required for:

- Spill Prevention Equipment*
- Release Detection Equipment Operation

Annual periodic walkthrough inspections are required for:

- Containment Sumps*
- Handheld Release Detection Equipment

*Exceptions:

- Spill Prevention Equipment receiving deliveries less often than 30 days may check prior to each delivery. **Delivery records should be maintained as part of log.**
- Containment Sumps and Spill Prevention Equipment that is a qualifying double wall design may have the interstitial area checked for leaks in lieu of periodic testing requirements. **Failure to conduct these checks will trigger the periodic test requirement within 30 days.**

Walkthrough Inspections

All **Active** Facilities should have a minimum of 12 months of walkthrough inspection documentation at this point.

It is true that

DEP has provided a sample form for walkthrough inspections

However

Facilities may use any format that documents all the requirements established sections 245.435 & 245.438:

- **245.435 (21):** ...Records must include a list of each area checked, whether each area checked was acceptable or needed action taken, a description of actions taken to correct an issue and delivery records if spill prevention equipment is checked less frequently than every 30 days due to infrequent deliveries.
- **245.438** states that the following must be checked:

Spill Prevention Equipment	Visually check for damage, Remove liquid or debris, Check for and remove obstructions in the fill pipe, Check the fill cap to make sure it is securely on the fill pipe, For double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area.
Release Detection Equipment	Check to make sure the release detection equipment is operating with no alarms or other unusual operating conditions present. Ensure records of release detection testing are reviewed and current.
Containment Sumps	Visually check for damage and the presence of liquid or debris, Remove liquid or debris, For double-walled sumps with interstitial monitoring, check for a leak in the interstitial area, For handheld release detection equipment, check devices such as tank gauge sticks or groundwater bailers for operability and serviceability.

FOI Compliance – Corrosion Protection

All Corrosion Evaluations completed after December 21, 2018 **MUST** be submitted with the FOI Report form.



When reviewing or completing CP Evaluation Forms:

- Document the code of practice from a nationally recognized association used for the evaluation:
 - **STI R051** is a code of practice
 - **STI** is a nationally recognized association
- **Reminder:** Sections of the form may be Not Applicable (N/A) **BUT** none are optional.
- Include a site diagram showing where readings were taken
- DEP (or anyone) should be able to replicate your results by using the code of practice listed and the documentation provided.

Unknown Components

- All USTs, UST piping (primary piping and piping connectors), and UST ancillary equipment must be identified during the FOI.
 - All UST components that can be inspected visually through non-intrusive means should be.
 - Primary records should be used for components that cannot be visually inspected.
- After your investigation: If components are still of unknown construction, that component should be reported as noncompliant on page 1.
 - Details of your investigation should be included in the comments.

Tank Construction and Corrosion Protection	N	N
Piping Construction and Corrosion Protection	N	N

FOI Compliance – Periodic Testing

- Testing Compliance and Timing:
 - Initial periodic testing is only compliant if it is completed before December 22nd, 2021

Date of FOI	Testing Date	Compliant?
8/7/2022	12/21/2021	Yes
8/7/2022	8/1/2022	No

Note: After December 21, 2022, all facilities should be 3 years from the first round of testing, when their FOI occurs

-Information provided on the FOI should be the most recent date of periodic testing

FOI Compliance – Periodic Testing

Important things to remember:

- Forms must be **complete** – **** **Owner's Signatures** ****
- Write legibly or Print/Type
- Identify the test method protocol and/or standard that was used
- Review the form before signing and submitting
 - Maintain a copy and provide one to the facility
- Record the manufacturer and model information
- If you are completing the forms during a tank modification, please submit them with the report
- The owner needs to sign the forms
 - The owner's representative signature proves the form was received by the appropriate individuals at the facility.

FOI Compliance – Periodic Testing

Updates to Testing Forms

- Automatic Tank Gauge Functionality Testing Form (2630-FM-BECB0015)
 - Minor updates to formatting and numbering
- Spill Prevention Equipment/Containment Sump Integrity Testing Form (2630-FM-BECB0016)
 - Some of the sections were rearranged to make more space for the Site Drawing and the numbering was corrected
- Sensor Functionality Testing Form (2630-FM-BECB0020)
 - Significant changes were made to this form to allow this form to cover all required annual testing for release detection at facilities where the ATG/Sensor controller does not have a probe and all release detection is completed by interstitial monitoring.
 - The form references a new Site Drawing form for the site drawings related to the sensor testing form.
- Storage Tank Facility Site Drawing (2630-FM-BECB0027)

FOI Compliance – Periodic Testing

New Periodic Testing Requirements	Timeframe	Exceptions
Spill Prevention Equipment	3 Years	X
Containment Sumps	3 Years	X
Overfill Prevention Equipment	3 Years	
Release Detection Equipment	Annual	X

- **Some designs of double-walled** Spill Prevention Equipment and Containment Sumps can be monitored by periodic walkthrough inspections & not have to conduct periodic testing.
- Containment Sumps must routinely contain product and be used for **Interstitial Monitoring** to require periodic testing.
- Handheld Release Detection Equipment (Bailers and Gauge Sticks) are checked during periodic walkthrough inspections.

FOI Compliance – Periodic Testing

Overfill Prevention Equipment Evaluations

- Current Overfill Prevention Options must be able to:
 - Automatically shut off flow at no more than 95% full **OR**
 - Alert the transfer operator at no more than 90% full
 - Alternative Methods for both options were deleted.
- Overfill Prevention Equipment must be permanently installed.
- Newly installed Overfill Prevention Equipment must be tested at installation.

FOI Compliance – Periodic Testing

Overfill Prevention Equipment Evaluations

– Ball Floats

- **NO** installs, repairs, replacements, or upgrades after December 22, 2018
- Ball Floats that **FAIL** an Overfill Evaluation or cannot be evaluated shall be replaced with another form of overfill prevention equipment.
- During the installation of different type of overfill prevention equipment (e.g. drop tube shutoff valve or overfill alarm), the entire ball float assembly must be removed.

FOI Compliance – Periodic Testing

Spill Prevention Equipment & Containment Sump Evaluations

Containment Sumps used for Interstitial Monitoring must be evaluated periodically.

Some designs of double-walled spill prevention & containment sumps when **properly monitored by periodic walkthrough inspections** are not required to test for liquid tightness

- The periodic walkthrough inspection documentation should specifically document checks to verify that the interstice on each double-walled component is free of leaks
- If walkthrough inspections are discontinued, evaluations are due within 30 days.
- **See EPA Technical Compendium to determine if your DW equipment qualifies:**
<https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulation#spillbuckets>
- Newly installed Spill Prevention Equipment & Containment Sumps must be tested at installation.

FOI Compliance – Periodic Testing

Reminders

- Testing must have been conducted **after 12/21/2018** to be considered valid ::
 - **As we move beyond the initial periodic testing phase-in period, recordkeeping requirements will be similar to PRD annual testing recordkeeping requirements.**
- Testing must be documented on the DEP-provided forms

FOI Compliance – Release Detection

Statistical Inventory Reconciliation (SIR):

- SIR results must be provided at the conclusion of the 30-day monitoring period.
- More information: <https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulations#releasedetection>

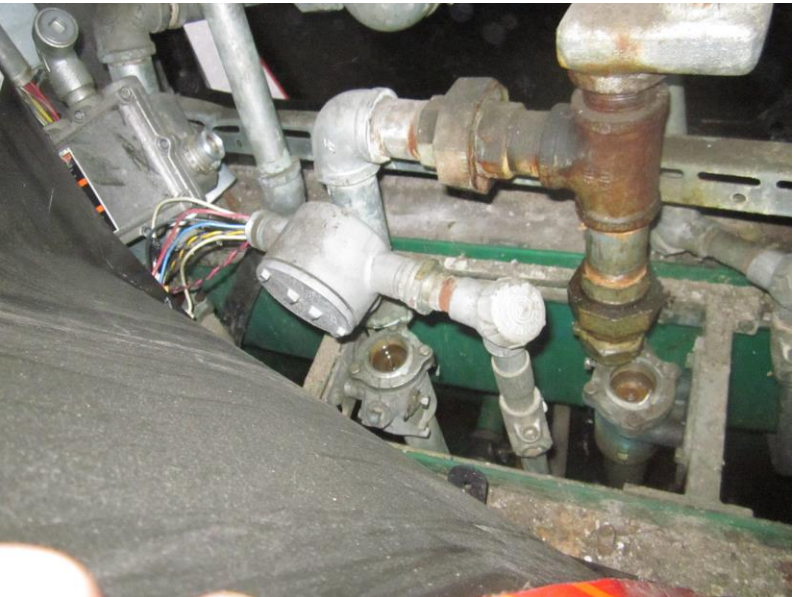
All Pressurized Piping:

Install Date	Upon Detection of a Release, the LLD Shall
On or Before 11/10/2007	Restrict or Shutoff flow of regulated substances through the piping if unattended and open for business
After 11/10/2007	Shutoff flow of regulated substances through the piping

Emergency Generator USTs must implement release detection:

Install Date	Release Detection Required By
After December 22, 2018	At Installation
After November 10, 2007	On or Before December 22, 2019
On or Before November 10, 2007	On or Before December 22, 2020

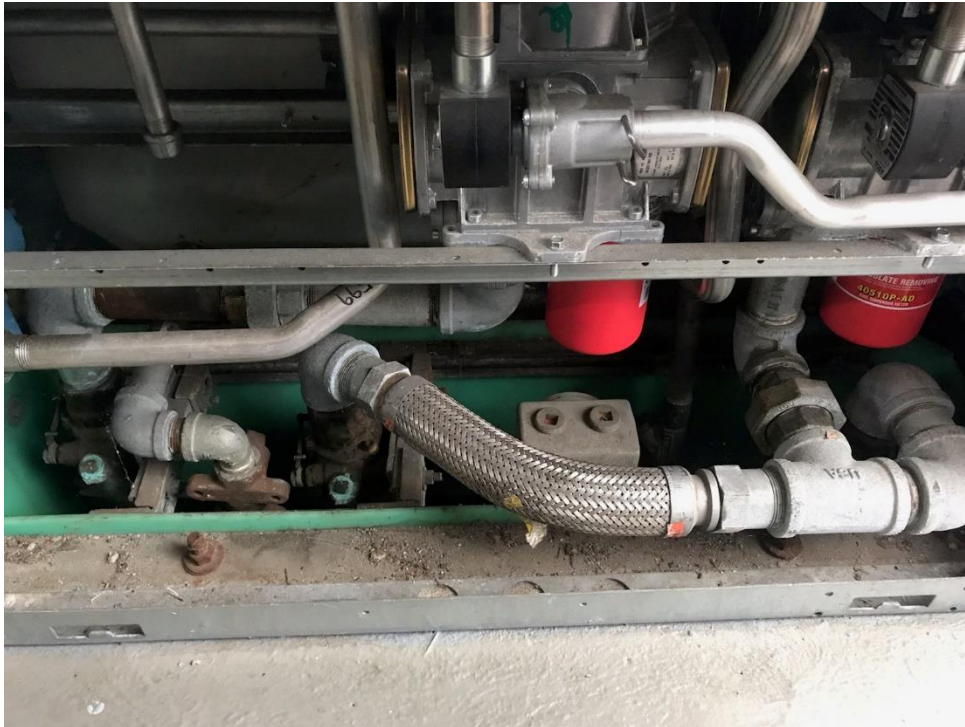
▶ Shear Valves and Piping Manifolds



▶ Shear Valves and Piping Manifolds



Shear Valves and Piping Manifolds



Shear Valves and Piping Manifolds

Piping Manifolds installed above a shear valve:

- Violation of shear valve manufacturer's and dispenser manufacturer's installation instructions.
- Fire safety hazard due to inability to properly shear.



The fix:

- Move piping manifold back to the tank side (double-walled piping, excavation, etc.)
- Move manifold below shear valves.



Shear Valves and Piping Manifolds

Concerns: What about Release Detection?

Option 1 : Double-walled piping, tank top sumps, dispenser sumps, and conduct interstitial monitoring with sensors in all sumps.

- Could mean downtime and extensive amounts of money.

Option 2 : Electronic line leak detector

- PLLD should be located on one STP and both STPs should have SwiftCheck valves.

Option 3 : Mechanical line leak detector

- One on each STP may be used, but both STPs cannot run at the same time.
- Must be wired and/or ATG programmed
- Will not be allowed on one STP and a check valve on the second STP.

Financial Responsibility

Reviewing Financial Responsibility Records

---- Not required for State and Federal Facilities ----

- **USTIF Billing & Capacity Fees:**
 - When reviewing USTIF coverage, verify the facility does not have an overdue balance with USTIF via USTIF receipts, cancelled checks, etc.
- **Throughput Fees:**
 - If the facility includes tanks containing substances subject to USTIF throughput fees, verify that a recent bill of lading or other delivery invoice indicates that the throughput fees were paid to the delivery company.
 - If throughput fees were **not** paid to the delivery company, the fees should be paid directly to USTIF.

* The owner or operator should be advised that unpaid USTIF fees for **ANY** UST at the facility will jeopardize USTIF coverage for **ALL** USTs at that facility in the event of a release.

PA UST Tax - Gasoline

9,001 GG

0.011000

99.01

Other Important Information

Important Notes for All Certified Individuals

Release Reporting
Requirements

Dispenser Replacements

Tank Handling Notifications

Compatibility Requirements

Document Submissions – When, Where, Why, and How

Tank Registration

Common Issues

ePermitting

Certification

Overview of the most important reminders from the Certification Unit.

Release Reporting

Remember: Owner and Operator reporting requirements are not the same as the reporting requirements for certified installers and certified inspectors.

245.132 Standards of Performance require:

(4) Report the following to the Department while performing services as a certified installer or certified inspector:

- (i) A release of a regulated substance.**
- (ii) Suspected or confirmed contamination of soil, surface or groundwater from regulated substances.**
- (iii) A regulated substance observed in a containment structure or facility.**

(5) Report to the Department a failed test of spill prevention equipment, containment sumps and overflow prevention equipment conducted as required in this chapter.

Tank Handling Notifications

Note: After December 22, 2018, if a dispenser is removed and a major modification is performed involving excavation beneath the dispenser, it is also a partial system closure requiring a 30-day Closure Notification and sampling. These requirements apply in all cases including when the original dispenser is reinstalled.

Tank Handling Notifications

Notification shall be submitted to DEP (the appropriate regional office) **30 Days Prior to commencing certain Tank Handling Activity and all Closure Activities**

Underground Storage Tank System Installation-Closure Notification Form
2630-FM-BECB0127 [ONLINE SUBMISSION](#)

Installation - 245.421(a)(2)	Permanent Closure and Change-in-service
Tank	Tanks
Piping System	Replacement, Removal and Closure-in-place of underground product piping or remote fill lines
Replacement Dispenser (new to the facility)	
Additional Dispenser	
	Major Modification involving removal of a dispenser*

Dispenser Replacements

When must under-dispenser containment be installed?

DEP regulations have maintained the existing requirements:

- Under each dispenser of a new or replacement UST system,
- Under each dispenser added to an existing UST system,
- Under an existing dispenser when more than 50 percent of the piping conveying product from the tank to the dispenser is replaced
- **If a major modification as defined in § 245.1 (relating to definitions) is performed at the dispenser area involving excavation beneath the dispenser**

The regulation amendments have added an additional requirement:

- **If an existing dispenser is replaced with another dispenser and all equipment at or below the shear valve needed to connect the dispenser to the underground storage tank piping system is replaced**
- Replaced means new to this dispenser location. The dispenser can be used, refurbished, or new.

Dispenser Installation or Removal

Remember: All tank handling activities should be carefully evaluated to ensure the facility's needs are met while adhering to manufacturer's installation guidance and all relevant regulatory requirements.

Event	30 day notice	U M R	U M X	U M I	Major Mod	Minor Mod	Site Assessment & Closure Report	UDC Required
Dispenser Installation								
Install a new dispenser at a new location	X		X		X			X*
Dispenser Removal								
Permanent closure of the dispenser	X	X			X		X	
During TOS Status			X	X		X		

*Also requires positive submersible turbine pump shutdown and interstitial monitoring for the length of new piping installed to this new dispensing location.

Dispenser Replacements

Event	30 day notice	U M R	U M X	U M I	Major Mod	Minor Mod	Site Assessment & Closure Report	UDC Required
Dispenser Replacement								
Disconnect dispenser at or above shear valve : Simple unbolt/bolt on	X		X	X		X		
Excavation is required beneath the dispenser (saw cutting, jack hammering, etc.)	X	X	X		X		X	X
All components between dispenser and underground piping are replaced.	X	X	X*	X	X*	X	X*	X
*Required if excavation is needed underneath the dispenser								
Please see Sections 245.421, 245.422, and 245.452 for additional information about dispenser installation, removal, and replacement.								

Dispenser Refurbishments

**Service Company:
Hunter Pump Islands**



Cleans up: Paint Chipping, concrete deteriorating, rust/corrosion, poor image.

Protects Against: Gasoline, salt, chemicals, rust, corrosion, extreme weather, heat.



Dispenser Refurbishments



- No downtime on pump system.
- Stainless steel set overtop of existing island - 3" out from original.
- Pour new concrete 2" higher than original island.
- New concrete isolated from dispenser by nonmetallic expansion material.

Dispenser Refurbishments: Concerns

Refurbishments and Shear valves

- Concern over shear valves not operating properly due to new island height.
- Two leading manufacturers (OPW and EBW) were tested and approved per UL 842

However: Shear Valve manufacturer opinions differ for approval of use



Compatibility Requirements

For all USTs installed to store or will be converted to store:

1. Gasoline-ethanol blend containing **greater than 10%** ethanol
2. Biodiesel or a biodiesel blend containing **greater than 5%** biodiesel

The DEP provided Alternative Fuel Storage Tank Installation/Conversion Form shall be submitted, reviewed, and approved prior to DEP issuing an operating permit.

1. The form should be complete.
 1. Extensive details and instructions are available on the form.
2. The form should be signed by the tank owner or owner's representative, a Professional Engineer if necessary, and the DEP certified installer.
 - 1. The ultimate responsibility lies on the UMX to ensure that all system components are compatible with the substance stored.**
 - 2. Please note that incorrect, inaccurate, and falsified forms have led to enforcement action against certified installers and their companies.**
3. PEI, UL, ASTSWMO, and manufacturers all have resources for assessing compatibility of UST components.

Modification Report Submission

Overfill prevention equipment removals: Minor Modification

- Should always be completed by a **UMI** or **UMX**
- Must be reported on a modification report within 30 days.
- Only exception: if a tank is being tightness tested and the UTT removes the overfill drop tube to conduct testing.

(7) Overfill Prevention Installation or Modification (describe status of previous overfill prevention i.e. removed, remains as backup in VII. Comments)

- Helps keep track of tanks with or without overfill drop tubes.
- Overfill drop tubes many times get removed during tank pumping to place in TOS and are never replaced.
- Required information when returning to C status.

Document Submission - Complete

Please verify that all forms are completed before submitting to DEP

Form(s)	Frequently Forgotten Items
FOI	Detailed comments, manufacturer and model info, complete cp section, equipment testing info
Modification Report	Site diagram, detailed comments, new install component testing verification, ball float assembly removal verification
Spill Prevention Testing	Pass/fail threshold, owner's signature, manufacturer and model info, test method protocol/standard
All Other Equipment Testing	Owner's signature, manufacturer and model info, test method protocol/standard
CP Testing	Nationally recognized standard, site diagram, continuity determination

Document Submission - When - Where

Form	Submission Timeline	Regional	Central
FOI	60 Days	X	X
Lining Inspection	60 Days	X	X
Mod Report	30 Days	X	X
30 day Install/Closure Notice	30 Days Prior	X	
Closure Report	30 Days	X	
Release Reporting	48 Hours	X	
Overfill, Spill Prevention or Containment, and UTT Test Failures	48 Hours	X	
Installation Registration	30 Days		X
Amended Registration (1 Page)	30 Days	X	X
Closure/Removal Registration	30 Days	X	X
TOS Extension Request Letters	Prior to Expiration		X

DEP is Going Paperless

To assist DEP in reaching this goal, the Division of Storage Tanks is requesting that ALL documents, with the exception of documents submitted through the ePermitting or OnBase applications, be submitted by email.

Documents may be emailed to Central Office and the appropriate Regional Office. The email addresses are:

Central Office: tanks@pa.gov

Region 1 (SE): ra-serotanks@pa.gov

Region 2 (NE): ra-nero-tanks@pa.gov

Region 3 (SC): ra-ep-scro-tanks@pa.gov

Region 4 (NC): ra-nc-tanks@pa.gov

Region 5 (SW): ra-pghtanks@pa.gov

Region 6 (NW): ra-nwro-tanks@pa.gov

***NOTE:** Please be aware that the maximum file size for attachments is 20MB. Additionally, please note that electronic submittal via these email addresses does not guarantee receipt of the document by DEP. It is recommended that email read receipts are used and properly documented.*

DO NOT USE THESE EMAIL ADDRESSES FOR SUBMITTING A FORMAL RIGHT TO KNOW LAW REQUEST TO THE DEPARTMENT.



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PROTECTION

Online Registration - ePermits

Storage Tank Registration and Permits are available Online.

Search: **Storage Tank ePermit**

The first result:

ePermitting

<https://www.dep.pa.gov/Business/Land/Tanks/Pages/ePermitting.aspx>



Storage tank owners may now pay annual **Storage Tank** registration fees online through the Department's ePermitting application on Greenport. Follow the steps ...

Online Registration - ePermits

We Can Accept:

Registration Fee Payments

Existing Clients – New Facility Registration

Add Tank(s)

Remove or Close Tank(s)

Change Tank Status

Change Tank Substance

Online Registration - ePermits

We Can Accept:

Updated Facility Contact Information

Updated Owner Information

Updated Site Information

Updated Facility Information

We Cannot Accept:

Change of Ownership Applications

Paper Registration Applications

DEP's 13-page Storage Tanks Registration / Permitting Application Form is also available.

II. CURRENT OR NEW TANK OWNER / CLIENT INFORMATION			
DEP Client ID#	Client Type/Code	Fee Kind (check one if applicable)	
		<input type="checkbox"/> Volunteer Fire Co/EMS Org	<input type="checkbox"/> State Govt
Organization Name or Registered Fictitious Name		Employer ID# (EIN)	
		BLANK	

Most errors are missed fields

The ePermit system provides immediate feedback!

Paper Registration Applications

Most frequently missed information:

- Section II (Tank Owner):
 - Employer ID# (EIN)
- Section IV (Facility):
 - Facility Kind
 - Latitude/Longitude

IV. FACILITY INFORMATION						
Facility Name				Facility Kind		
Facility Location Line 1			Facility Location Line 2			
State			ZIP+4			
Latitude		Longitude				
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds	
Feet			Meters			

Paper Registration Applications

Most frequently missed information:

- Section VI (Tank Information):
 - Install Date for New Tanks
 - Change of Status Date
 - Removal Date
- Section IX (Owner Certification):
 - Owner's Signature
 - Date Signed

Paper Registration Applications

Most frequently missed information:

- Section X (Installer Information):

Tank#	Installer/Remover Name	Construction Standard	Individual Certification#	Certification Category	Company Certification#	Installer/Remover Signature	Date
						Missing	Missing

- Required Attachments
 - UST Operator Training Documentation Form
 - Class A/B Operator Certificates

Registration Certificates

- DEP no longer sends registration certificates if invoices are paid online
 - Facility owners have access to the certificate right away
 - The same applies for if the tank status is changed online
- DEP still prints and mails registration certificates if transactions are handled via mail
- Security paper will no longer be used for printed registration certificates
 - Do not be surprised to run across ones printed on plain paper
 - If you question the legitimacy of the certificate, it can be verified on the Active Storage Tank Search (USTs and small ASTs only)

Certification Reminders - Renewals

Know your expiration date

- Plan Ahead
 - Start scheduling trainings at 12-18 months
 - Technical Training
 - Administrative Training
 - Exam Dates

Certification Reminders - Renewals

Renewal is NOT Automatic

- Submit (Email) the Renewal Application and Technical Training Certificates

SECTION II – APPLICATION TYPE

FIRST certification request

MODIFY/ADD certification

RENEW certification

Certification Reminders

DEP communicates frequently by email.

DEP encourages you to communicate with us by email:

tanks@pa.gov

Notify DEP of changes:

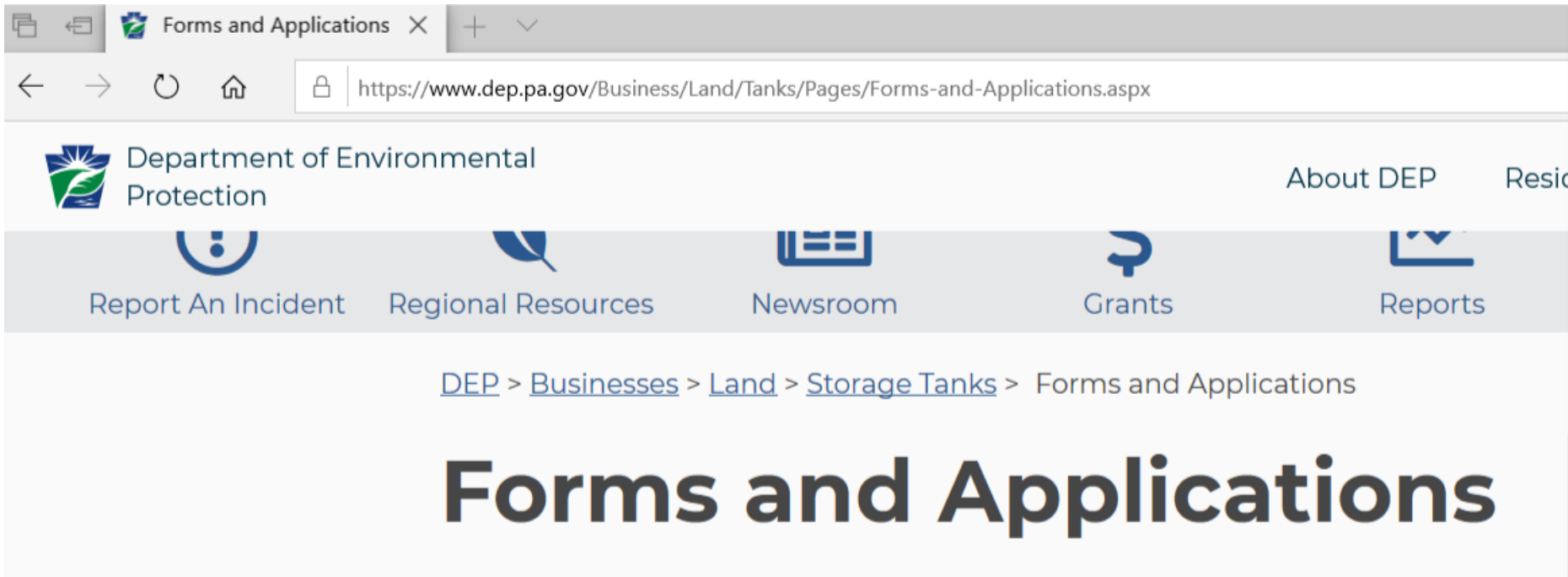
Address

Employer

Email

Certification Reminders

Use the most recent revision of DEP's forms.



The screenshot shows a web browser window with the following elements:

- Browser tab: Forms and Applications
- Address bar: <https://www.dep.pa.gov/Business/Land/Tanks/Pages/Forms-and-Applications.aspx>
- Department of Environmental Protection logo and name.
- Navigation menu: Report An Incident, Regional Resources, Newsroom, Grants, Reports.
- Breadcrumbs: [DEP](#) > [Businesses](#) > [Land](#) > [Storage Tanks](#) > Forms and Applications
- Main heading: **Forms and Applications**

Certification Reminders – TIIP Fees



Tank Installers (TIIP)

Installation companies are required to pay an annual fee and activity fees for tank removals, installations and modifications through the fee billing system.

[How to Set up An Account](#)

[Program Fees](#)

[How to File a Claim](#)

[Frequently Asked Questions](#)

Certified Companies

Pay Your TIIP Fees

<https://ustif.pa.gov/>

Certification – New Applicants

**Complete
60 Days
All Supporting Documents**

Submit All Supporting Documents.

Verify your Application is Complete.

Sign your application – no computer fonts.

Submit your Application at least **60** days before the desired exam date.

Certification – New Applicants

Attachment A activities must be verified.

2630-PM-BECB0506c 4/2012

Applicant Name _____

III-b. Storage Tank Facility Employer Information

Provide detailed information for each activity listed in Section III-a. The activity numbers in III-a. must correspond to the activity numbers listed in III-b.

Facility where the work was completed	DEP Verified	Applicant's employer when work was performed
Activity No. 1 Owner Name _____ Facility Name _____ Pa Facility I.D. # _____ Address _____ City _____ State _____ Zip _____ Owner Contact _____ Contact Phone () _____ – _____ Facility Phone () _____ – _____	Approved <input type="checkbox"/> Verified	Company Name _____ Address _____ City _____ State _____ Zip _____ Contact _____ Phone () _____ – _____ Verifying Official Signature _____ Reported under PA certification ID _____
Activity No. 2 Owner Name _____ Facility Name _____ Pa Facility I.D. # _____ Address _____	Approved <input type="checkbox"/> Verified	Company Name _____ Address _____ City _____ State _____

AST Information

Modification Inspections

- Required for Major Mods to Field-constructed ASTs and ASTs >21,000 gallons.
 - Inspector must be involved prior to initiation of project, and present at critical times.

Chapter 245 Revisions (December, 2018)

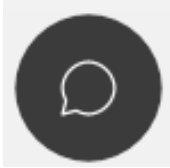
- Small AST inspection interval: 5-year max
- Vaulted AST inspection interval: 6-12 months post-installation; 3-year max, thereafter.
- Emergency containment installed or replaced after 10/11/1997 or for Tanks installed after 10/11/1997 must meet 1×10^{-6} cm/s permeability requirement.
- Annual ICCP system test, 60-day rectifier checks; three-year Galvanic test.
- Contractor logs for facilities with aggregate capacity > 21,000 gallons

Facility Recordkeeping

- Record review is a critical part of an AST integrity inspection
(Installation; Modification; O&M Plan; SPRP; CP; Testing; Piping Inspection; Containment: compatibility, capacity, permeability; etc.)

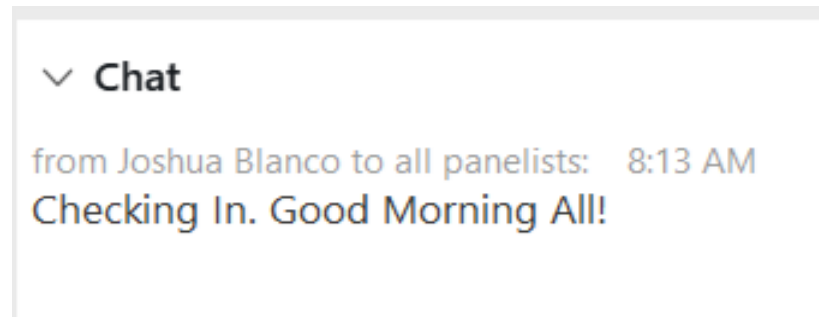
****If you hold AST certifications, you're required to comply with AST regulations whether or not you've attended the AST-specific training course.*

Attendance



Please use the Chat function.

Type your First Name and Last Name into the chat window.



****Remember****

Your chat should be addressed to All Panelists.



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Bureau of Environmental Cleanup & Brownfields

Questions?

Josh Blanco

717-772-5804

jblanco@pa.gov

<https://www.dep.pa.gov/Business/Land/Tanks/Certification/Pages/Training-for-Certified-Individuals.aspx>