LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY UST E-NEWSLETTER

SPRING 2011 ISSUE NO. 12

TOP TEN UNDERGROUND STORAGE TANK REGULATION VIOLATIONS IN FISCAL YEAR 2010

The 10 most frequent violations cited to underground storage tank owners from inspections performed October 1, 2009 to September 31, 2010 are as follows:

#10

LAC 33:XI.307.B: Failure to pay the annual UST registration or maintenance and monitoring fee.

This violation was cited 77 times in FY 2010. Every year LDEQ sends an invoice to all UST owners for the annual registration fee and annual monitoring and maintenance fees. The annual registration fee is $54 per tank for petroleum USTs. The annual monitoring and maintenance fee is $158 per tank for USTs that contain petroleum products that are not motor fuels, $275 per tank for USTs that contain new or used motor oil, and $660 per tank for USTs that contain hazardous substances. The UST owner will receive a current UST certificate once the fees are paid. If you don't have a current certificate, your annual monitoring and maintenance fee may not be paid. If you're not sure if your fees are current, contact *Carol Stamey at 225-219-3913*.

#9

LAC 33:XI.703.A.1: Failure to conduct release detection on an underground storage tank.

This violation was cited 80 times in FY 2010. Conducting release detection on underground storage tank systems is the most important activity an owner can perform. Early detection of a release will protect human health and the environment by allowing the release to be stopped and addressed quickly, and can save the UST owner money by minimizing the amount of product that is lost. There are many different types of tank release detection that can be conducted: interstitial monitoring, automatic tank gauging, statistical inventory reconciliation, groundwater and vapor monitoring with release detection devices, inventory control, and manual tank gauging (the last two listed expire 10 years from the date the tank was either installed or upgraded with corrosion protection). Not performing monthly release detection carries an automatic penalty and is a violation that also leads to automatic delivery prohibition (red tagging). UST owners and operators must perform monthly release detection to determine if their tanks are leaking.

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#8

LAC 33:XI.903.A: Failure to maintain corrosion protection on temporarily closed UST systems.

This violation was cited 81 times in FY 2010. UST systems that are in temporary closure must be continuously protected from corrosion, just like

operating tank systems. This is important because a temporarily closed UST system will be put back into service at some time in the future. All UST system components that are in contact with soil and/or water must be protected from corrosion and the corrosion system must be tested periodically. Anodes must be tested every three years, impressed current systems must be operating continuously and tested every three years, and impressed current rectifiers must be inspected every 60 days to determine proper operation, even if the UST system is in temporary closure.

#7

LAC 33:XI.509.B.4: Failure to maintain release detection records.

This violation was cited 88 times in FY 2010. Release detection records must be maintained for 3 years. Not only must the records be maintained, the facility operator must actually read them and understand them in order to be able to determine if a release is occurring.

#6

LAC 33:XI.903.D: Failure to conduct a site assessment for a UST system that was in temporary closure for more than 2 years.

This violation was cited 99 times in FY 2010. A UST owner must conduct a site assessment once a UST system has been in temporary closure for 24 months. Not all release detection if 100% accurate and many releases do not show up until a UST system is permanently closed. The reason for the temporary closure site assessment is that releases have gone undetected for many years while tank systems were in temporary closure for indefinite periods of time. The temporary closure site assessment requirements are outlined in the May 1, 2010 UST Closure Guidance Document.

#5

LAC 33:XI.503.A.2: Failure to test cathodic protection system every 3 years.

This violation was cited 105 times in FY 2010. All UST system components that are in contact with soil and/or water must be protected from corrosion, and the corrosion system must be tested periodically. Anodes must be tested every three years, impressed current systems must be operating continuously and tested every three years, and impress current rectifiers must be inspected every 60 days to determine proper operation. LDEQ is in the process of writing a Cathodic Protection Evaluation Guidance Document that will standardize all cathodic protection test protocols and documentation requirements.

#4

LAC 33:XI.703.B.2.a.ii: Failure to conduct a line tightness test on pressurized lines every 12 months.

This violation was cited 115 times in FY 2010. Release detection must be performed on pressurized product lines, either by a monthly release detection method (interstitial monitoring, statistical inventory reconciliation, automatic tank gauge with pressurized line leak detectors) or by testing annually (line tightness test). Testing product lines is especially important because most UST system releases come from the product lines, not the tanks. Not performing monthly release detection carries an automatic penalty and is a violation that also leads to automatic delivery prohibition (red tagging).

#3

LAC 33:XI.701.B.1: Failure to test line leak detector every 12 months.

This violation was cited 116 times in FY 2010. All pressurized product lines must have an automatic line leak detector (LLD) installed, and the LLD must be tested every 12 months to ensure that it is operating properly. There are many different types of line leak detectors: mechanical, pressurized, electronic, wireless, etc. Regardless of the type of LLD installed, the annual test must be conducted in accordance with the manufacturers' requirements and the test must simulate a release in order to determine that the LLD is operational. Catastrophic releases continue to occur that could have been prevented with properly operated LLDs.

#2

LAC 33:XI.903.B: Failure to notify the Department of a UST system that has been in temporary closure for 3 months or more.

This violation was cited 129 times in FY 2010. Whenever a UST system has been in temporary closure for three months or more, the UST owner must notify the Department using the UST-REG-01 form. The UST owner must also make sure that the vent lines are left opened and functioning, all lines, pumps, manways, and ancillary equipment are capped and secured, corrosion protection is maintained and tested as required, and monthly release detection is performed if there is more than one inch of product in the UST.

#1

LAC 33:XI.303.D.2 and E.4: Failure to protect metal components of a UST system that are in contact with the soil and/or water from corrosion.

This violation was cited 146 times in FY 2010. All UST system components that are in contact with soil and/or water must be protected from corrosion. This includes the metal flexible hoses that are used to connect product piping to dispensers and submersible turbine pumps, and also includes the submersible turbine pump head. This requirement has been overlooked by many UST owners, installers and repair contractors, and has led to many releases and violations. Also, many metal flexible hoses are located within containment sumps that were water tight upon installation but are no longer water tight.

UST regulations are designed to protect human health and the environment by preventing releases and allowing the early detection of releases, thus minimizing their impact. Complying with UST regulations also helps UST owners and operators because product releases will result in lost product revenue and costly remediation projects. Owners and operators must remain vigilant in all areas of UST compliance, but especially in these 10 areas of common non-compliance.

PETRO CLASSROOM

Petroleum Storage Tank Training consists of training for Class A, B, or C Operator Certification Training, as required by the Energy Policy Act of 2005. To check for current and upcoming seminars available in Louisiana, Petro Classroom is available on the web at: http://www.petroclassroom.com/state_choice.php?state=Louisiana

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY UST E-NEWSLETTER

UST CLOSURE/CHANGE-IN-SERVICE GUIDANCE DOCUMENT

The Louisiana Department of Environmental Quality, Underground Storage Tank Division has revised the LDEQ Underground Storage Tank Closure/Change-in-Service Guidance Document. The effective date of this revision was ***May 1, 2010***. LDEQ UST Division made an effort to create a new closure guidance document that incorporated current UST closure practices and site-closing technology while keeping closure costs at or below their current cost. LDEQ UST Division provided training on the new document to all certified closure contractors, but not all certified closure contractors attended. It is still the responsibility of the UST owner that UST closures are performed according to the regulations and new closure guidance document requirements. When selecting a closure contractor, please verify that they will be performing the closure according to these new requirements.

In addition, LDEQ UST Division has revised the Notification of Intent to Perform a Closure or Change-in-Service to an Underground Storage Tank System Form (UST-SURV-01) and the Underground Storage Tank Closure/Assessment Form (UST-SURV-02). As of May 1, 2010, LDEQ UST Division will no longer accept the old (multi-page carbon or carbonless) forms. The new forms are available on the LDEQ UST Division webpage, under the headings UST Program Information; UST Forms.

For more information, see the LDEQ UST Division website at www.deq.louisiana.gov or contact *Samuel Broussard at 337-262-5744.*

HELPFUL DOCUMENT LINKS:

- Final Version of Closure Guidance Document
- Closure Guidance Document Memo

UST CERTIFIED WORKER EXAM SCHEDULE 2011

DATE AND TIME	REGION	LOCATION
May 5 Installation/Repair 8:30AM Closure 1:30PM	CRO	LA. DEQ (Map) 602 North Fifth Street, Baton Rouge, LA 70802

UST COMPLIANCE CLASS SCHEDULE 2011

DATE AND TIME	REGION	LOCATION
May 11 8:00AM -12:00PM	ARO/SWRO	LA Technical College (Map)- Morgan Smith Campus - Jennings
June 8 1:00PM – 5:00PM	CRO	LDEQ (Map)- Galvez Building – Baton Rouge

**** For more information:***
http://www.deq.louisiana.gov/portal/tabid/2277/Default.aspx

PETROCLASSROOM OPERATOR TRAINING SCHEDULE 2011

Louisiana Class Schedule	
May 24, 2011	**Monroe, LA**
The Atrium Hotel 2001 Louisville Avenue Monroe, LA 71201 Map Cost: Free	
May 25, 2011	**Shreveport, LA**
Holiday Inn Shreveport West 5555 Financial Plaza Shreveport, LA 71129 Map Cost: Free	
May 26, 2011	**Marksville, LA**
Paragon Casino Resort 711 Paragon Place Marksville, LA 71351 Map Cost: Free	
August 30, 2011	**Kenner, LA**
Doubletree New Orleans Airport Hotel 2150 Veterans Memorial Blvd. Kenner, LA 70062 Map Cost: Free	
August 31, 2011	**Lafayette, LA**
Crowne Plaza Lafayette Airport 1801 West Pinhook Road Lafayette, LA 70508 Map Cost: Free	
September 1, 2011	**Baton Rouge, LA**
Holiday Inn South 9940 Airline Highway @ I-12 Baton Rouge, LA 70816 Map Cost: Free	
October 18, 2011	**Monroe, LA**
The Atrium Hotel 2001 Louisville Avenue Monroe, LA 71201 Map Cost: Free	
October 19, 2011	**Shreveport, LA**
Holiday Inn Shreveport West 5555 Financial Plaza Shreveport, LA 71129 Map Cost: Free	
October 20, 2011	**Marksville, LA**
Paragon Casino Resort 711 Paragon Place Marksville, LA 71351 Map Cost: Free	

** For more information: www.petroclassroom.com*