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TOP TEN UNDERGROUND STORAGE TANK REGULATION VIOLATIONS IN FISCAL YEAR 2011

The 10 most frequent violations cited to underground storage tank owners from inspections performed October 1, 2010 to September 31, 2011 are as follows:

#10

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 39 times in FY 2011. 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.



#9

LAC 33:XI.903.A: Failure to conduct release detection on a temporarily closed UST system that contains more than 1 inch of product.

This violation was cited 45 times in FY 2011. UST systems that are in temporary that are not emptied must maintain monthly release detection. Empty is defined as less than one inch of product. Tanks must either be pumped out to less than one inch of product or monthly release detection must be performed.

#8

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

This violation was cited 65 times in FY 2011. 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.

#7

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

This violation was cited 65 times in FY 2011. 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 report content requirements.

#6

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



This violation was cited 67 times in FY 2011. 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

#5

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

This violation was cited 67 times in FY 2011. 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.

#4

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 76 times in FY 2011. 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.

#3

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 82 times in FY 2011. 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).

#2

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 85 times in FY 2011. A UST owner must conduct a site assessment once a UST system has been in temporary closure for 24 months. Not all release detection is 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.

#1

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

This violation was cited 113 times in FY 2011. 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.

Comparison to last years Top Ten list shows some very good trends. Failing to protect metal components from corrosion was cited 146 times last year and only 39 times this year. Failure to conduct monthly release detection on tanks was cited 80 times last year and only 32 times this year.

Unfortunately, failing to perform line tightness testing and line leak detector testing have both been cited more times this year than last year. UST owners should make a concerted effort this year to improve the compliance rate of this commonly cited violation. Releases from



product lines can be catastrophic, especially if the line leak detectors do to function properly. Ensuring that product lines are not leaking and line leak detectors are functioning properly can save UST owners and operators money in the long run by detecting costly releases earlier and possibly preventing them altogether.

OPERATOR TRAINING UPDATE

As you all probably know by now, LDEQ has been sponsoring UST Operator Training seminars and the program is being administered by Louisiana Compliance Services, LLC (LCS), a subsidiary of the Louisiana Oil Marketers and Convenience Store Association (LOMCSA). LCS has contracted Williams and Company Consulting, Inc. to perform the training. There have been 39 seminars conducted so far and attendance has been good. There are currently 1630 Certified A and B Operators and 927 Certified Class C Operators in Louisiana. The deadline for all UST Operators to be certified is August 8, 2012.

If your facility was inspected after February 20, 2010 and you have not been able to have your class A and B UST operators trained within nine

months within the inspection date, please register as soon as possible or contact Samuel Broussard by phone (337-262-5744) or email (samuel.broussard@la.gov). For facilities that have not been inspected after February 20, 2012, the training deadline is August 8, 2012.

There are only 9 seminars scheduled before August 8, 2012 and 1 scheduled on August 9, 2012. If your UST facility does not have a certified Class A or B Operator, please designate your Class A and B Operators and have them register for a seminar at www.petroclassroom.com as soon as possible.

For those UST operators who have attended one of the seminars and haven't done so already, please contact Samuel Broussard at LDEQ by phone (337-262-5744) or email (samuel.broussard@la.gov) and provide a list of all of the facilities that you are an operator for.

Class A or B Operators can train their Class Cs themselves, can designate someone to train them, can use an on-line or cd training course, etc. A list of on-line Class C training providers can be found on the LDEQ website (www.deq.louisiana.gov), UST Page, Operator Training FAQs. Also,



remember to provide a list of your class C operators that have received training to LCS in order to receive their class C certificates. The names of the class C person trained, the date of the training, and the UST owner that they work for must be either emailed to lomcsa@lomcsa.com or mailed to:

Louisiana Compliance Services, LLC
 P. O. Box 80357
 Baton Rouge, LA 70898-0357

CERTIFIED WORKER RESPONSIBILITIES

According to the Louisiana UST Closure/Change-In-Service Guidance Document Certified Workers must adhere to the following:

- Only LDEQ Closure Certified Workers may supervise a UST closure or change-in-service.
- LAC 33:XI.905.A.2 requires UST owners to ensure that the individual that exercises supervisory control over all closure-critical junctures is certified in accordance with LAC 33:XI.Chapter 13.



- The certified individual must be present at the site and must exercise responsible supervisory control during all closure-critical junctures of the closure process.
- LAC 33:XI.1303 defines closure-critical junctures as the process of cleaning/vapor removal, all subsurface sample collection events, and the process of removal of the tank or filling the tank with inert material.
- A list of LDEQ certified workers may be obtained from the LDEQ website at <http://www.deq.louisiana.gov> (Divisions; Underground Storage Tank; UST Program Information; Registration and Permits; Certified Worker Information; List of UST Certified Workers).

Source: Louisiana UST Closure/Change-In-Service Guidance Document, May 1, 2010, pg. 2.

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

UST CERTIFIED WORKER EXAM SCHEDULE 2012

DATE AND TIME	REGION	LOCATION
July 12 Installation /Repair 8:30AM Closure 1:30PM	NWRO	LA. DEQ (Map) 1525 Fairfield Ave, Shreveport, LA 70802

UST COMPLIANCE CLASS SCHEDULE 2012

DATE AND TIME	REGION	LOCATION
July 24 8:00AM - 12:00PM	NWRO	LA Technical College (Map) Shreveport/Bossier Campus - Shreveport Room A213

* For more information:

<http://www.deq.louisiana.gov/portal/Portals/0/enforcement/training/2012%20UST%20Training%20Schedule.pdf>



PETROCLASSROOM OPERATOR TRAINING SCHEDULE 2012 - Free Training

Louisiana Class Schedule

May 22, 2012	Kenner, LA
Doubletree New Orleans Airport Hotel 2150 Veterans Memorial Blvd. Kenner, LA 70062 Map Cost: Free	
May 23, 2012	Lafayette, LA
Holiday Inn Lafayette 2032 NE Evangeline Thruway Lafayette, LA 70510 Map Cost: Free	
May 24, 2012	Baton Rouge, LA
Holiday Inn South 9940 Airline Highway @ I-12 Baton Rouge, LA 70816 Map Cost: Free	
June 12, 2012	Monroe, LA
The Atrium Hotel 2001 Louisville Avenue Monroe, LA 71201 Map Cost: Free	
June 13, 2012	Shreveport, LA
Holiday Inn Shreveport West 5555 Financial Plaza Shreveport, LA 71129 Map Cost: Free	
June 14, 2012	Marksville, LA
Paragon Casino Resort 711 Paragon Place Marksville, LA 71351 Map Cost: Free	
August 6, 2012	Kenner, LA
Doubletree New Orleans Airport Hotel 2150 Veterans Memorial Blvd. Kenner, LA 70062 Map Cost: Free	
August 7, 2012	Kenner, LA

Doubletree New Orleans Airport Hotel
2150 Veterans Memorial Blvd.
Kenner, LA 70062 [Map](#)
Cost: Free

August 8, 2012 Lafayette, LA

Holiday Inn Lafayette
2032 NE Evangeline Thruway
Lafayette, LA 70510 [Map](#)
Cost: Free

* For more information: www.petroclassroom.com

