

Louisiana Underground Storage Tank Worker Certification Program (Effective Date – January 20, 1992)

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The following is to be used as guidance in clarifying the intent of the underground storage tank worker certification regulations. As questions arise, the Louisiana Department of Environmental Quality (LDEQ) will address them in this document.

A. The following installation, repair, and closure activities require the presence and supervision of a UST certified worker (installation/repair certified worker for installation/renovation or repair activities and closure certified worker during closure activities):

1. Installation

- a. The preparation of the excavation immediately prior to receiving backfill and the tank.
- b. The setting of the tank and the piping, including placement of any anchoring devices, backfilling to the level of the tank, and strapping (if any).
- c. Any time during the installation or renovation in which piping components are connected which includes but is not limited to product piping, risers, vent piping, or the connection of the underground piping to the bottom of the shear valve in a pressure system or to the bottom of the check valve in a suction system or connection of the underground piping to the first above ground component.
- d. All pressure testing of the UST system (including associated piping) performed during the installation or renovation.
- e. Completion of the backfill and filling of the excavation.
- f. Installation of external release detection devices associated with groundwater and vapor monitoring within the excavation zone during an installation.
- g. Installation of containment sumps during an installation or renovation.
- h. Installation of spill and overflow prevention equipment during an installation or renovation.

2. Repair

- a. The completion of the excavation of existing tanks and/or piping.
- b. The actual performance of the repairs to the tank and/or piping.

- c. Any time during the repair process when components of the piping are connected. However, if the repair involves the connection of an above ground component with an underground component and the connection itself will be underground, the repair needs to be supervised by a certified worker. On the other hand, if the connection will remain above ground, the repair does not need the supervision of a certified worker.
- d. Any time during the repair process when the tank and/or the associated piping are tested.
- e. Any time during the modification process when equipment is connected to the tank and/or piping e.g. installation of an automatic tank gauge or a submersible turbine pump where a riser is required to be connected to the tank. The same thought process applies here as in c above. Depending on the location of the connection will determine if a certified worker needs to be present.
- f. Removal and excavation of paving and backfill as required to expose the top of a tank prior to lining the interior.
- g. Cutting a sufficiently sized access opening in the tank to allow entry by interior lining personnel.
- h. Inspection and precision testing as required to ascertain the adequacy and integrity of the completed interior lining.
- i. Reinstallation of the access opening or construction of a permanent man-way, including repair, inspection, and testing.

3. Closure

- a. The process of cleaning a tank.
- b. The process of vapor removal or purging a tank.
- c. The process of inerting a tank.
- d. The collection of subsurface samples taken to determine if a release has occurred, unless a response action contractor approved by the department under LAC 33:XI.Chapter 12 is present and is exercising responsible supervisory control of sample collection events.
- e. The removal of a tank or filling a tank with inert material.

B. The following UST activities do not require the presence and/or supervision of a certified worker:

1. Installation

- a. Installation of UST systems which are excluded or partially excluded from the Louisiana Underground Storage Tank Regulations (e.g., aboveground tanks, UST systems whose capacity is 110 gallons or less, flow-through process tanks).
- b. Installation of any component of an UST system which is located above the ground level, including aboveground tanks; aboveground

pipings, valves, fittings, and connectors; aboveground dispensers; aboveground vent lines; aboveground metering systems; and aboveground suction pumps.

- c. Installation of any non-UST improvements: structures, fixtures or appurtenances at a UST facility, such as concrete and asphalt paving; electrical wiring conduit and controls; site utilities; storm sewer and drainage improvements; buildings; dispenser islands; awning or canopies; signs; landscaping; septic tanks; and fences.
- d. Installation, maintenance or inspection of cathodic protection systems, including sacrificial anodes, impressed current systems (including rectifiers and non-sacrificial anodes), test stations and all appurtenant components.
- e. Installation of a liner that is not part of a repair or upgrade.
- f. Dry fitting of piping which includes product or vent piping.

2. Repair

- a. Inspection and assessment of the interior of the tank to determine whether the interior lining is appropriate or feasible.
- b. Application of appropriate lining materials (e.g., epoxy resins) to all or parts of the interior portion of the tank, including application of such materials for the repair or refurbishing of a fiberglass reinforced plastic (FRP) tank.
- c. Repair or replacement of underground storage tank submersible pumps (including motors, internal electrical components and pumping apparatus) unless piping is disconnected.
- d. Repair of UST systems which are excluded are partially excluded from the Louisiana Underground Storage Tank Regulations (e.g., aboveground tanks, UST systems whose capacity is 110 gallons or less, flow-through process tanks).
- e. Repair of any component of an UST system which is located above the ground level, including aboveground tanks; aboveground piping, valves, fittings, and connectors; aboveground dispensers; aboveground vent lines; aboveground metering systems; aboveground suction pumps.
- f. Repair of any non-UST improvements: structures, fixtures or appurtenances at a UST facility, such as concrete and asphalt paving; electrical wiring conduit and controls; site utilities; storm sewer and drainage improvements; buildings; dispenser islands; awning or canopies; signs; landscaping; septic tanks; and fences.
- g. Repair, maintenance or inspection of cathodic protection systems, including sacrificial anodes, impressed current systems (including rectifiers and non-sacrificial anodes), test stations and all appurtenant components.
- h. Repair of spill prevention equipment or repair of a containment sump.

- i. Replacement of spill prevention equipment, unless the riser is disconnected from the tank.
- j. Replacement of a containment sump unless the riser or product piping is disconnected.
- k. Removal and reinstallation of an overfill device during tightness testing or inspection if the device is located inside of a riser and the riser is not removed from the tank. If the device is directly connected to the tank then a certified worker is required.

3. Closure

- a. Activities related to the transportation, disposal and storage of used UST system components, (including tanks, piping and ancillary UST equipment) which occur after such components have been removed from the site at which they had previously been in service.
- b. Closure of UST systems which are excluded or partially excluded from the Louisiana Underground Storage Tank Regulations (e.g., aboveground tanks, UST systems whose capacity is 110 gallons or less, flow-through process tanks).
- c. Closure of any component of an UST system which is located above the ground level, including aboveground tanks; aboveground piping, valves, fittings, and connectors; aboveground dispensers; aboveground vent lines; aboveground metering systems; aboveground suction pumps.
- d. Removal of any non-UST improvements: structures, fixtures or appurtenances at a UST facility, such as concrete and asphalt paving; electrical wiring conduit and controls; site utilities; storm sewer and drainage improvements; buildings; dispenser islands; awning or canopies; signs; landscaping; septic tanks; and fences.
- e. Maintenance or inspection of cathodic protection systems, including sacrificial anodes, impressed current systems (including rectifiers and non-sacrificial anodes), test stations and all appurtenant components.

C. Other activities that are not considered critical junctures:

- 1. Activities associated with the assessment, remediation or corrective action required to address releases from UST systems as long as activities do not include repair or modification of the UST system.
- 2. Installation of release detection devices (RDD) at an existing facility. Note that a site assessment outlining the type of backfill material and/or the permeability of native soils between the tank and the RDD, the locations of the RDDs, the screened interval of the RDDs, and the sealant of the RDDs must be developed for all RDD installations occurring after September 20, 2018, and the assessment must be signed by a professional engineer, a professional geologist, or an equivalent licensed professional with

experience in environmental engineering, hydrogeology, or other relevant technical discipline acceptable to the department (a response action contractor approved by the department under LAC 33:XI.Chapter 12).

3. Collection of water or vapor samples from RDDs.
4. Construction of UST monitoring wells, borings or piezometers when constructed as part of the assessment or remediation of sites contaminated from leaking UST systems.
5. Activities associated with the performance of a tank tightness test or a piping tightness test when conducted in accordance LAC 33:XI.701 and when the test equipment is not installed as a permanent component of the UST system including:
 - a. Removal and excavation of paving and backfill as required to expose the appropriate UST system components for tightness testing purposes.
 - b. The temporary installation or connection (and eventual removal or disconnection) of any equipment required only for and during the process of conducting the tightness test.
 - c. The disconnection and reconnection of piping, valves, fittings and other UST system components when required for the purpose of conducting the tightness test.
 - d. Reinstallation of backfill and paving after completion of the tightness test.

D. Use of a subcontractor to perform UST work

1. The LDEQ has no objection to the use of a subcontractor who is not a UST certified worker performing a critical juncture provided that there is a certified UST worker present during the critical juncture who has complete supervisory control over the UST work being performed. The certified UST worker should be aware that his/her certificate may be revoked in the event of a violation of the regulations.