



Fuel Compatibility Storage Guidance

UST Compatibility Requirement for Biofuel Blends

Notice of the EPA announces the availability of proposed guidance found at <http://www.gpo.gov/fdsys/pkg/FR-2010-11-17/pdf/2010-28968.pdf> that clarifies how owners and operators of underground storage tank (UST) systems can comply with the compatibility requirements under 40 CFR 280.32 when storing gasoline greater than 10 percent ethanol and diesel containing an amount of biodiesel yet to be determined.

The federal UST regulations require that “owners and operators must use an UST system made of or lined with materials that are compatible with the substance stored in the UST system” (40 CFR § 280.32). Because the chemical and physical properties of ethanol and biodiesel can make these fuel blends containing them more degrading to certain UST system materials than petroleum, it is important to ensure that all UST system components in contact with the biofuel blend are materially compatible with that fuel. Industry practice has been for owners and operators to demonstrate compatibility by using equipment certified by an independent testing laboratory, such as Underwriters Laboratories (UL). However, many UST system components in use today, with the exception of most tanks and piping, have not been tested by UL for compatibility. Without certification from a third party that these equipment are compatible with anything beyond conventional fuels, the suitability of these particular components for use with ethanol and biodiesel blends comes into question.

EPA is soliciting comments on or before December 17, 2010 on the proposed guidance, which will provide underground storage tank owners and operators with greater clarity in demonstrating compatibility of their tank systems with these fuels.

Sumped?

Don't be. Know the maintenance requirements and improve compliance.

A common release at UST sites occurs from spills made during delivery. Human error is the cause and can be avoided if everyone involved in the fuel delivery follows industry standard practices for tank filling. USTs must also have spill buckets to contain small spills. Basically, a spill bucket is a bucket sealed around the fill pipe.

EPA developed a 16-page manual that presents underground storage tank (UST) system owners and operators with recommended inspection guidelines and best management practices for their UST system sumps and spill buckets.

The manual will: help owners identify and inspect the sumps and spill buckets associated with their UST systems; explain some simple steps owners can take to maintain their sumps and spill buckets and identify potential problems; and provide owners with tips for fixing common problems before they cause a release of petroleum products to the environment. The manual includes safety considerations; a general introduction to the kinds of sumps; basic maintenance procedures for sumps and spill buckets; and a sump and spill bucket inspection checklist. <http://www.epa.gov/swrust1/pubs/sumpmanl.htm>.

Why should you care about sump and spill bucket maintenance? Because inadequate operation and maintenance is one reason these systems release petroleum to the environment, and with the average cleanup cost for a leaking UST over \$100,000 (\$1,000,000 if groundwater is affected). It pays to be proactive.

What's a Sump

A sump is a pit that provides access to your equipment located below ground, and when contained prevents liquids from releasing into the environment. The type of Sump you may have includes: Turbine, Dispenser, Transition/Intermediate (for piping) and Spill Buckets.

What's a Spill Bucket

A spill bucket is a contained sump that has been installed at the fill and/or vapor recovery connection points to contain drips and spills of fuel that occur during delivery. Spill buckets are also called catchment basins or spill containment manholes. Basically, a spill bucket is a basin sealed around the fill pipe.

Things to look for when inspecting include checking for free liquids, debris, good connections with UST equipment, cracks in the sumps or seals, proper sensor positioning, and piping corrosion.

More on Spill Buckets

To protect against spills, the spill bucket should be large enough to contain what may spill when the delivery hose is uncoupled from the fill pipe. A typical delivery hose can hold about 14 gallons of fuel. Spill buckets range in size from those capable of holding only a few gallons to those that are much larger – the larger the spill bucket, the more spill protection it provides.

You need a way to remove liquid from spill buckets. Manufacturers may equip spill buckets with either a pump or drain to remove liquid. Or you can purchase a spark free hand pump. You should try to keep your spill bucket clean and empty. Some spill buckets can collect enough water and sediment, along with spilled product, to make draining this mixture into the tank unwise. If this happens, you may pump out the spill bucket and dispose of the liquid properly. If the liquid contains fuel or chemicals, it could be considered a hazardous waste.

Rise in Diesel Release Claims

With an uptick in diesel release claims, and reports of ULSD causing more corrosion in tanks, many trade organizations are monitoring the situation (including the steel tank institute, the Petroleum Equipment Institute) along with Tank Owners Members Insurance and our claims department. We anticipate providing a fact sheet or guidance document in the near future. In the interim, please do regular inspections of your equipment to catch corrosion early and prevent releases.

PST Super Guide/ TCEQ Small Biz Assistance

Need help? Afraid to ask questions? Don't be.

The Small Business and Local Government Assistance program provides confidential technical assistance without the threat of enforcement. Look them up at www.TexasEnviroHelp.org toll free at 1-800-447-2827. They have specialists in Petroleum Storage Tanks that can assist you with Compliance needs. They also have developed the Petroleum Storage Tank Super Guide – A comprehensive guide to compliance in Texas. The guide includes regulatory guidance on 14 different items ranging from buying and selling properties, conducting repairs to your monthly release detection. The guide can be found online at http://www.tceq.state.tx.us/comm_exec/forms_pubs/pubs/rg/rg-475.html

Inspection Checklist

The law requires UST systems be inspected regularly all state agencies must be on-site once every three years to inspect USTs at all UST locations (Including yours!!). Ensure you are prepared by viewing the inspection checklist available at: <http://www.tceq.state.tx.us/assets/public/assistance/sblga/checklists/energy-act-focused-investigation-checklist.pdf>

SPILL & LEAK REPORTING!

For spills and releases at your site that are either greater than 25 gallons on land or any amount that enters water (surface water, storm drain, groundwater)

**YOU ARE REQUIRED
to report it
IMMEDIATELY.**

**To report petroleum or
hazardous substance spills:**

CALL-

1. Texas Commission on Environmental Quality
Hotline: 800-832-8224
New Mexico Facilities:
New Mexico Environment
Department: 505-827-9329

and

2. National Response Center:
800-424 8802

and

3. Tank Owners Members
Insurance Company:
800-336-1338

***Do not Delay-
Failure to notify can lead to
costly environmental clean-ups,
fines and violations! It can also
result in claim denials!!***

Frequently Used Phone Numbers

TOMIC Member Service Team:

(817) 336-1336 or (800) 336-1338
www.tankowners.com
service@tankowners.com

Texas Commission on Environmental Quality:

Petroleum Storage Tank Team (512) 239-6120
UST & Stage II Technical Support (512) 239-0300
TCEQ-Help Line (512) 239-2038
Or check out their website at: www.tceq.state.tx.us

Environmental Protection Agency:

Office of Underground Storage Tanks (703) 603-7171
www.epa.gov

New Mexico Environmental Department:

Petroleum Storage Tank Team (505) 984-1741
www.nmenv.state.nm.us

1600 W. Seventh Street • Fort Worth, Texas 76102

TANK OWNER
MEMBERS INSURANCE COMPANY