



Bureau of Environmental Cleanup & Brownfields

Administrative & Underground Storage Tank Inspector Seminar



Josh Shapiro, Governor

Richard Negrin, Secretary

➤ Introduction - What to Expect Today

- Underground Inspector (IUM) Training
- Administrative Training
 - Applicable to all certification categories with a focus on information for UST certification categories.
 - UMX / UMI
 - UMR
 - UTT
 - IUM



Introduction – Contacts

USTs – FOIs, Modifications, and Testing Forms

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ASTs – Inspections and Modifications

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Introduction – Storage Tanks

Who We Are

A team of regulators and supporting staff focused on protecting the air, land, and water of Pennsylvania from storage tank releases.

How?

1st: Effective Prevention of Releases

2nd: Timely and Effective Responses to Releases

Methods

- Utilize existing industry expertise (3rd Party Program)
- Maintain an effective inspection program
 - Timely inspection compliance follow-up
- Communication with the regulated community

Expertise & Communication



“Nobody ever told me that.”

You’re welcome to attend DEP training as often as you’d like.

Information being shared is for your benefit.

Opportunity for discussion to better Tanks Program.

DEP's Eyes & Ears



In addition to doing much of the hard work in keeping Pennsylvania's USTs in compliance



DEP depends on our certified individuals and companies to be our eyes and ears within the commonwealth.



717-772-5599 // 1-800-42-TANKS



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Presentation Overview

New or Important Topics

Air Quality News & Information – Stage II VR

Periodic Testing Forms: Updates & Expectations


The Meaning of “Industry Standard” to DEP

Releasing Reporting

Dual Use USTs

Dispensers Replacements and Partial System Closures

Air Quality News



**New Air Quality
Regulations in effect
March 26, 2022**

Who:

Owners and
Operators in the 12
Philadelphia and
Pittsburgh Area
Counties

AND

Their petroleum
equipment service
providers

Air Quality Regulations

Highlights

What:

1. Stage II Vapor Recovery Decommissioning
2. Low Permeation Hoses and ECO Nozzles
3. Testing Requirements
4. Inspection Requirements after fuel delivery
5. Recordkeeping & Reporting Requirements

More Information

Search “**Stage II Vapor**” at <https://www.dep.pa.gov>

First Result

OR <https://www.dep.pa.gov/Business/Air/BAQ/Automobiles/Gasoline-and-Vapors/Pages/Decommissioning-Stage-II-Vapor-Recovery-Systems-at-Gasoline-Dispensing-Facilities.aspx>

Stage II VR Decommissioning

- Stage II may now be decommissioned without dispenser replacement.
- DEP now allows Stage II to be decommissioned in 12 Counties in Pittsburgh and Philadelphia
 - Allegheny, Armstrong, Beaver, Bucks, Butler, Chester, Delaware, Fayette, Montgomery, Philadelphia, Washington and Westmoreland
- Stage II Decommissioning Regulations were effective March 26, 2022
- Vacuum- assist systems should have been decommissioned by **December 31, 2022**
- Vapor balance systems will be allowed to be decommissioned but are not required.

Reminders

- Notification must be submitted to Regional Air Quality Program Manager
 - Retroactive notifications are expected by the Bureau of Air Quality
- A Modification report should be submitted to the DEP Central and Regional Office
- Decommissioning must follow PEI/RP300-09 and be performed by a certified UMI or UMX

▶ Low Permeation Hoses & ECO Nozzles

Applicability

- **Monthly** greater than 10,000 gallons
 - 50,000 gallons for an independent small business marketer
 - Throughput is calculated as the average over 365 days (January 1 to December 31);
 - Once exceeded, the facility is always considered subject to the regulation.

Requirements

- **New Facilities or New Dispensers:**
 - Install Low Permeation Hoses and ECO Nozzles at installation.
- **Existing:**
 - Install Low Permeation Hoses by March 26, 2024
 - Install ECO Nozzles by May 14, 2024
- **Equipment requires CARB certification**

➤ Low Permeation Hoses & ECO Nozzles

- The CARB Executive Orders in NVR-1 updates certified low permeation hoses and ECO nozzles.

EXHIBIT 1

Component List

Component	Manufacturer / Model	Hose Size (inch)
Low Permeation Curb Hose and Whip Hose	ContiTech ¹ Futura Low Perm	3/4
	Parker 7282 Low Perm	5/8, 3/4, 1
	VST V58EC Low Perm	5/8
	VST V34EC Low Perm	3/4
	Husky EagleFlex Low Perm	5/8, 3/4, 1
Enhanced Conventional Nozzle	OPW 14E	3/4
	VST Enviro-Loc™	3/4
	Husky 6025	3/4

Periodic Testing Form Updates

- All UST Periodic Testing Forms have been updated
 - Effective May 25, 2022
 - Reduction of Paperwork
 - In most instances.
 - Friendly to multiple tests on same day
 - Full header, tester information, site drawing, and signatures are no longer on testing forms.
- Testing Certification Form Published
 - Required with all testing form submissions
 - Allows multiple test forms when:
 - Same Facility
 - Same Tester
 - Same Day

UNDERGROUND STORAGE TANK TESTING CERTIFICATION FORM

I. FACILITY INFORMATION – Type or print (in ink) all items.		Test Date
Facility ID #:	Facility Name:	
Facility Street Address:		
Facility Telephone:	County:	Municipality:
II. TESTER INFORMATION		
Tester Name:	Tester Cert. #:	Tester Telephone:
Company Name:	Company Cert. #:	Tester Email:
III. ATTACHED TESTING FORMS		
<input type="checkbox"/> All Passing	<input type="checkbox"/> Fail	Automatic Line Leak Detector Functionality Testing Form 2630-FM-BECB0021
<input type="checkbox"/> All Passing	<input type="checkbox"/> Fail	Automatic Tank Gauge Functionality Testing Form 2630-FM-BECB0015
<input type="checkbox"/> All Passing	<input type="checkbox"/> Fail	Sensor Functionality Testing Form 2630-FM-BECB0020
<input type="checkbox"/> All Passing	<input type="checkbox"/> Fail	Overfill Prevention Evaluation Form 2630-FM-BECB0018
<input type="checkbox"/> All Passing	<input type="checkbox"/> Fail	Spill Prevention Equipment/Containment Sump Integrity Testing Form 2630-FM-BECB0016
<input type="checkbox"/> All Passing	<input type="checkbox"/> Fail	Pressure/Vacuum Monitoring Functionality Testing Form 2630-FM-BECB0017
<input type="checkbox"/> All Passing	<input type="checkbox"/> Fail	Groundwater/Vapor Monitoring System Functionality Testing Form 2630-FM-BECB0019
Total Page Count - list the total count of pages for this testing package including the site drawing and cover page		
IV. SITE DRAWING		<input type="checkbox"/> Site Drawing Attached
Provide a detailed site drawing of the applicable UST(s), product piping, containment structures, and other layout details on 2630-FM-BECB0027. Clearly indicate all ancillary equipment which has been tested. Label each component with a unique number or code. Use that code to identify the component in the appropriate section on the appropriate testing form. Any other pertinent information should also be included.		
V. OWNER'S REPRESENTATIVE CERTIFICATION		
I have reviewed all attached reports. I certify under penalty of law as provided in 18 PA C.S.A. Section 4904 (relating to unsworn falsification to authorities), that the information provided by me is true, accurate, and complete to the best of my knowledge and belief.		
Signature:		Date Signed:
<input type="checkbox"/> By selecting this box, I, the undersigned tester, am acknowledging the owners' representative certification is unable to be obtained within the 48-hour timeframe required for notification to the Pennsylvania Department of Environmental Protection of test failures. I have provided a copy of an email sent to the owner showing proof of notification of test failure.		
VI. TESTER CERTIFICATION		
By signing this document as the Tester, I certify under penalty of law as provided in 18 PA C.S.A. Section 4904 (relating to unsworn falsification to authorities), that the information provided by me in all attached reports is true, accurate, and complete to the best of my knowledge and belief.		
Signature:		Date Signed:

Certification Form

- Only Testing Form that requires a signature
- New section for tester to indicate no owner's rep signature within 48 hours – Failures Only
- Include total page count including site drawing and cover page
- Please mark 'All Passing', 'Fail', or 'Not Applicable' for all testing forms.

Testing Forms

UNDERGROUND STORAGE TANK SPILL PREVENTION EQUIPMENT/CONTAINMENT SUMP INTEGRITY TESTING FORM

I. FACILITY INFORMATION – Type or print (in ink) all items.		Test Date		
Facility ID #: <input type="text"/>	Facility Name: <input type="text"/>	<input type="text"/>		
II. TEST RESULTS				
<input type="checkbox"/> Pass <input type="checkbox"/> Fail / One or More Failed				
<p>Failed test results constitute a suspected release. Certified Individuals must report confirmed or suspected contamination to DEP within 48 hours of observing it. This form must be submitted to the appropriate regional office with the notification of contamination form. Facility owners/operators must investigate suspected releases within 7 days. If a release is observed, it must be reported to DEP by telephone within 24 hours and in writing within 15 days.</p>				
III. TESTER INFORMATION, OWNER'S REPRESENTATIVE CERTIFICATION, and TESTER CERTIFICATION				
<input type="checkbox"/> All information provided on 2630-FM-BECB0028 Underground Storage Tank Testing Certification Form				
IV. TEST METHOD				
Method Used	<input type="checkbox"/> Hydrostatic		<input type="checkbox"/> Vacuum	<input type="checkbox"/> Pressure
	<input type="checkbox"/> Other: <input type="text"/>			
Method Developer	<input type="checkbox"/> Manufacturer	<input type="checkbox"/> Industry Standard:	<input type="text"/>	<input type="checkbox"/> Other: <input type="text"/>
Method's Pass/Fail Threshold		<input type="text"/>		
V. HYDROSTATIC TEST LEVEL MEASUREMENT				
<p>If devices were tested using a hydrostatic test, describe how level measurements were taken (i.e. from the bottom up, from the top down, from a mark on the sump wall)</p>				
<input type="text"/>				
VI. COMMENTS				
<p>The comments section should be used to note additional information discovered or actions taken during integrity testing that affect compliance at the facility. For example, include comments concerning any observations made by the tester that would affect the test results.</p> <p>Include actions taken to repair or replace failed devices. Repairs to containment sumps and spill prevention equipment require the use of a DEP certified individual.</p> <p>If additional comment sheets are needed, label each sheet with the report header information, and attach the sheet(s) to this form.</p>				

All Forms begin with the same 3 sections:

- Limited Header
 - Test Result Summary
 - Important Reminders for Tester or Owner/Operator
 - Confirmation that Testing Certification Form was completed
-
- Typically, the remainder of page one was used for information that covered test methods, comments, information about the whole test event, not specific components

Testing Forms

Page 2

- Designed to allow to use multiple copies when necessary: Label 2A, 2B, 2C and so forth
- Structured to contain individual components from beginning of evaluation to test result

Facility ID #: _____		Facility Name: _____		Test Date: _____	
VII. VISUAL INSPECTION INFORMATION					
Tank Number					
Product Stored					
Containment Number ¹					
Containment Type	<input type="checkbox"/> Dispenser <input type="checkbox"/> Tank Top Sump <input type="checkbox"/> Fill Spill Bucket <input type="checkbox"/> Transition	<input type="checkbox"/> Dispenser <input type="checkbox"/> Tank Top Sump <input type="checkbox"/> Fill Spill Bucket <input type="checkbox"/> Transition	<input type="checkbox"/> Dispenser <input type="checkbox"/> Tank Top Sump <input type="checkbox"/> Fill Spill Bucket <input type="checkbox"/> Transition	<input type="checkbox"/> Dispenser <input type="checkbox"/> Tank Top Sump <input type="checkbox"/> Fill Spill Bucket <input type="checkbox"/> Transition	<input type="checkbox"/> Dispenser <input type="checkbox"/> Tank Top Sump <input type="checkbox"/> Fill Spill Bucket <input type="checkbox"/> Transition
Manufacturer					
Model ²					
Were There Visible Cracks, Holes or Other Failures in the Containment?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was There Product in the Containment Prior to Testing?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was Product and Debris Removed from the Containment Prior to Testing?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/A
VIII. RESULT	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail
Failed visual inspections may constitute a suspected release. 1. Designate each device tested, numerically or by code, on the site drawing. 2. If model cannot be determined, describe device construction (Single-walled/Double-walled, Fiberglass, HDPE, etc.)					
IX. TESTING INFORMATION					
Test Start Time					
Test Start Level					
Test End Time					
Test End Level					
Test Period					
Level Change					
X. TEST RESULT	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail
XI. FAILURE DESCRIPTION					
If any device fails visual inspection or testing, describe the reason for the failure and the location of the failure for each failed device (i.e. "Cracked entry boot 4" from the bottom of dispenser sump #A1" or "Hole in bottom of Tank 002 fill spill bucket")					

Site Drawing

- Site Drawings are required
- DEP form is not required. Existing forms may be used.
- All testing forms have specific guidance for site drawings, components to provide, and labeling guidance

STORAGE TANK FACILITY SITE DRAWING					
I. FACILITY INFORMATION		Facility ID:		Facility Name:	
Street Address:			City:		ZIP:
GPS	LAT:	LONG:	County:		Municipality:
II. SITE DIAGRAM PREPARED BY			Name:		Telephone:
III. SITE DRAWING					

▶ Periodic Testing Submission Reminders

§ 245.31. Underground storage tank system testing requirements.

... Results shall be maintained onsite at the storage tank facility or at a readily available alternative site and shall be provided to the Department upon request.

- Passing reports should be provided to the owner/owner's Representative for signature
- Completed forms should be maintained by the owner/owner's representative as part of the facility's compliance records.
- Copies of the completed forms should be maintained by the DEP-certified individual who had conducted the testing.

Failed Periodic Testing Submission Reminder

§ 245.132. Standards of performance.

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

(a)(6) As required under paragraphs (4) and (5), notify the Department in writing within 48 hours of performing the failed test on a form provided by the Department. If the notification is being submitted because of a **failed** valid tightness test, spill prevention equipment test, containment sump test or **overflow prevention evaluation**, a copy of the test results must also be provided to the Department with the notification report.

- These failing reports **MUST** be submitted to the DEP Regional Office within **48 hours**.
- A copy of the test results **MUST** also be provided to the Department with the notification report.
- Documents **CAN** be submitted without an owner's signature if the appropriate supporting documents are submitted.

Nationally Recognized Standards

Attention Inspectors, Installers, and periodic testers!

“Industry Standard”

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

It is important that we have a discussion on what this commonly used shorthand reference means for DEP.

All certified tank handling and tank inspection activities should be done in accordance with an **“Industry Standard”**

Installations	Modifications
CP Evaluations	All Periodic Testing



Nationally Recognized Standards

“Industry Standard”

§ 245.405. Codes and standards.

(a) The following Nationally-recognized associations and their codes and standards shall be used in conjunction with manufacturer’s specifications to comply with this subchapter:

- (1) American Concrete Institute (ACI).*
- (2) American National Standards Institute (ANSI).*
- (3) American Petroleum Institute (API).*
- (4) American Society for Testing and Materials (ASTM).*
- (5) Association of Composite Tanks (ACT).*
- (6) Fiberglass Petroleum Tank and Pipe Institute.*
- (7) NACE International—The Corrosion Society (NACE).*
- (8) National Fire Protection Association (NFPA).*
- (9) National Leak Prevention Association (NLPA).*
- (10) Petroleum Equipment Institute (PEI).*
- (11) Steel Tank Institute (STI).*
- (12) Underwriters Laboratory (UL).*

Nationally Recognized Standards

“Industry Standard”

§ 245.421. Performance standards for underground storage tank systems.

(4) Installation.

(i) Underground storage tank systems shall be properly installed and system integrity tested in accordance with a code of practice developed by a Nationally recognized association or independent testing laboratory and in accordance with the manufacturer’s instructions.

The Meaning of “Industry Standard”

It **DOES NOT** mean what has been done for the last few decades **OR** how you have always done the 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

Nationally Recognized Standards

“Industry Standard”

§ 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 overfill 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 the UST system and determine if the system meets “Industry Standards” as defined in 25 Pa Code § 245.421

Nationally Recognized Standards

“Industry Standard” Example



Manufacturer specifications for braided steel flexible connectors typically require that they be installed without twisting.



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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:

Report a **failed** test of:

- spill prevention equipment
- containment sumps
- overfill prevention equipment

Release Reporting – Periodic Tests

Instructions are Included on the Testing Forms

Spill Prevention Equipment & Containment Sumps

II. TEST RESULTS	
<input type="checkbox"/> Pass	<input type="checkbox"/> Fail / One or More Failed
Failed test results constitute a suspected release. Certified Individuals must report confirmed or suspected contamination to DEP within 48 hours of observing it. This form must be submitted to the appropriate regional office with the notification of contamination form. Facility owners/operators must investigate suspected releases within 7 days. If a release is observed, it must be reported to DEP by telephone within 24 hours and in writing within 15 days.	

Overfill Prevention Equipment

II. TEST RESULTS	
<input type="checkbox"/> Pass	<input type="checkbox"/> Fail / One or More Failed
Failed tests must be reported by submitting this form to the appropriate regional office. Underground Storage Tanks may not receive product deliveries without functional overfill prevention.	

We should **NEVER** hear 'no one told you about this' if you are conducting periodic testing.

Release Reporting – Periodic Tests

Report a **failed** test of:

spill prevention equipment



Who: Certified Individual
conducting Periodic Test

What: Test Form &
Notification of
Contamination

When: Within 48 Hours

Where: Regional Office

Why: 245.132

How: Initial Phone Call &
Email Submission

Release Reporting – Periodic Tests

Report a **failed** test of:

overflow prevention equipment



Who: Certified Individual
conducting Periodic Test

What: Test Form

When: Within 48 Hours

Where: Regional Office

Why: 245.132

How: Email Submission

➤ Release Reporting – Periodic Tests

Report a **failed** test of:

containment sumps



Who: Certified Individual
conducting Periodic Test

What: Test Form &
Notification of
Contamination

When: Within 48 Hours

Where: Regional Office

Why: 245.132

How: Initial Phone Call &
Email Submission

▶ Release Reporting – Periodic Tests

Report a **failed** test of:

containment sumps; including visual failures



➤ Release Reporting – Certified Activities

WHO:

All Certified Individuals.

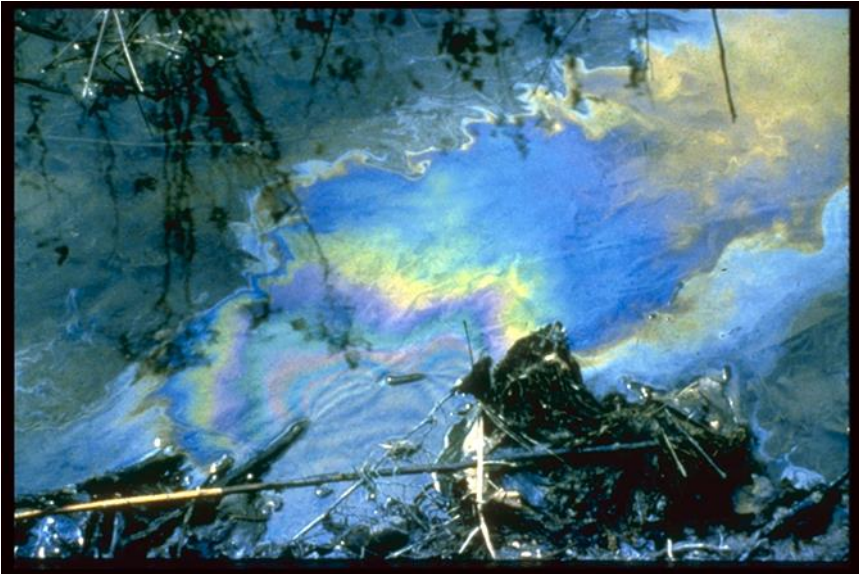
Anytime a certified individual is acting within their capacity as a certified individual conducting:

- **tank handling activities,**
- **Activities associated with tank handling activities,**
- **Testing activities,**
- **Inspection activities**

➤ Release Reporting – Certified Activities

WHAT:

A release of a regulated substance.



➤ Release Reporting – Certified Activities

WHAT:

Suspected or confirmed contamination of soil, surface or groundwater from regulated substances.



See § 245.304 – Indications of Suspected Releases

- Unusual level of vapors
- Evidence of regulated substance in soils, basements, sewer lines, utility lines, surface or groundwater
- Unusual operating conditions
- Discovery of holes or damage to a storage tank system

➤ Release Reporting – Certified Activities

WHAT:

A regulated substance observed in a containment structure or facility.



➤ Release Reporting – Certified Activities

WHEN, WHERE, WHY:

Within 48 Hours OR

immediate telephone notification for confirmed releases
(no later than 24 hours)

See § 245.132 – Standards of Performance

notify the Department in writing within 48 hours of performing the failed test or observing a release of a regulated substance, suspected or confirmed contamination, or a regulated substance in a containment structure or facility

When in doubt contact your local regional office and speak directly to a representative of the tanks program.

➤ Release Reporting – Certified Activities

HOW:

- During normal business hours, speak directly with a regional DEP representative in the storage tanks program.
- Outside of business hours call:
1-800-541-2050
- Please attempt to follow-up with a conversation with a regional representative of the storage tanks program.

Within 48 Hours:

Submit your **Notification of Release - Notification of Contamination Form (2630-FM-BECB0082)** to the regional office.

➤ Release Reporting – Certified Activities

HOW:

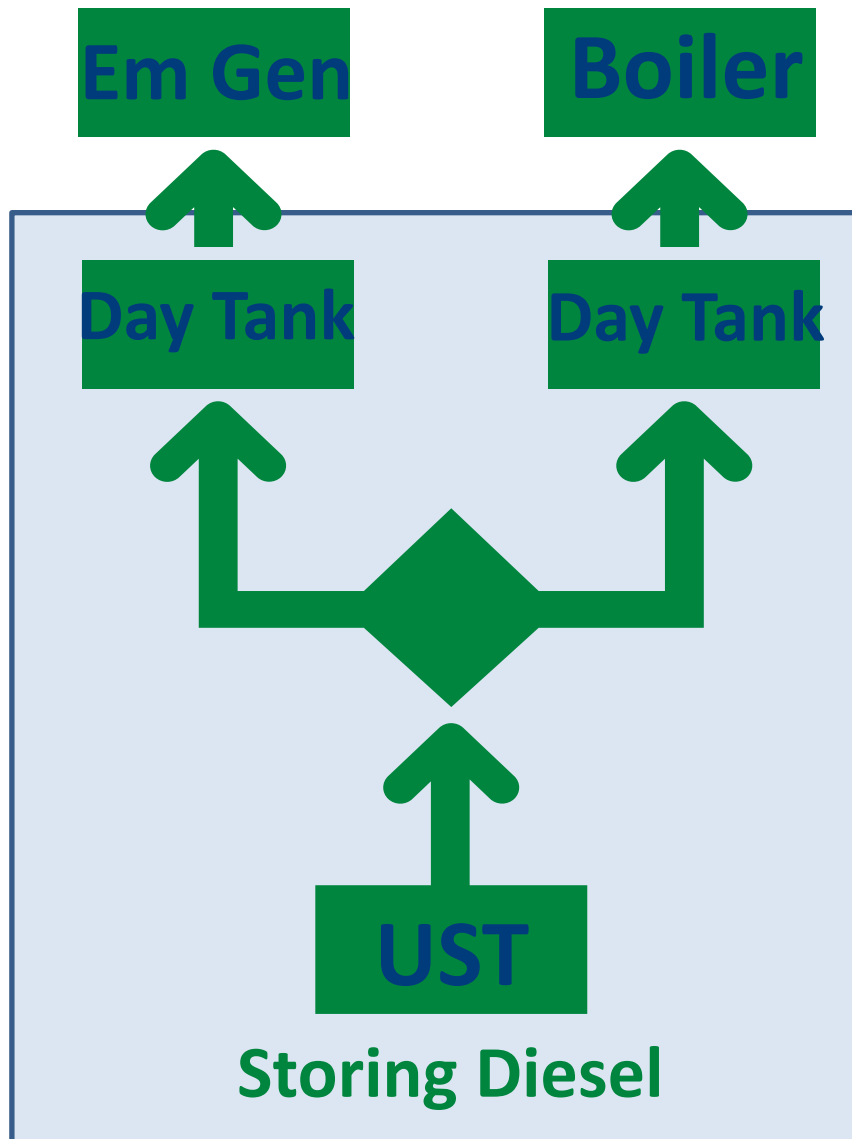
The Notification of Release - Notification of Contamination Form (2630-FM-BECB0082) includes instructions consistent with the previous slides and guide you through form completion.

INFORMATION FOR CERTIFIED INSTALLERS AND INSPECTORS (I/I)

In accordance with the Storage Tank Program's certification regulations, certified installers and inspectors must complete and submit this form to the Department within 48 hours of observing any of the following while performing services as a certified installer or inspector: a release of a regulated substance; suspected or confirmed contamination of soil, surface or groundwater from regulated substances; or a regulated substance in a containment structure or facility (Subsections 245.132(a)(4) and 245.132(a)(6)).

Certified Installers and Inspectors (I/I): Complete all information in Sections I, II, IIIA, IIIC, VI or VII, VIII, and IX. Attach a copy of the failed, valid tightness test results, if applicable.

Dual Use USTs



Everything within the shaded area is covered by DEP and EPA regulation.

The piping that supplies the boiler must be:

- Installed, modified, and removed by DEP-certified tank handlers.
- Inspected by IUMs during FOIs.
- meeting piping release detection requirements for regulated UST systems.

Dual Use USTs

For more information, please review the EPAs “Federal UST Requirements for Emergency Power Generator UST Systems” which can be found at:

[https://www.epa.gov/ust/release-detection-underground-storage-tanks-usts-introduction#:~:text=003\).%20May%202022.-,Emergency%20generator,-tanks](https://www.epa.gov/ust/release-detection-underground-storage-tanks-usts-introduction#:~:text=003).%20May%202022.-,Emergency%20generator,-tanks)

▶ Dispenser Replacements – New Requirements

After December 21, 2018

ALL

Dispenser Replacements require 30 Day notification to the appropriate regional office.



▶ Dispenser Replacements – New Requirements

- 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 UMR to oversee the 30-day closure notification, sampling, and appropriate closure report.

These requirements apply in all cases including when the original dispenser is reinstalled.

- If a dispenser was replaced involving major modification after November 10, 2007, then a liquid tight under dispenser containment should have been installed.

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.

➤ 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

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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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.

▶ 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
tank release detection records are all valid and passing	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>	<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"/>	<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"/>	<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"/>	<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"/>	<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 in 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.



Walkthrough Inspections

DEP provided Sample Walkthrough Inspection Checklist

30-Day Requirements

Spill Prevention Equipment	Tank No.	Tank No.	Tank No.	Tank No.	Tank No.
Damaged (Y or N)					
Clean & Dry (Y or N)					
Obstructions in Fill Pipe (Y or N)					
Fill Cap Fits Securely (Y or N)					
Vacuum/Pressure Gauge Functioning (if applicable) (Y or N)					
Liquid Gauge Functioning (if applicable) (Y or N)					

Damaged spill containment, debris/liquid in spill containment, obstructions in fill riser, and/or malfunctioning gauges require immediate attention by the owner/operator or the Class A/B operator.

Release Detection Equipment	Tank No.	Tank No.	Tank No.	Tank No.	Tank No.
Functioning (Y or N)					
Are Any Alarms Active (Y or N)					
Unusual Operating Conditions (Y or N)					
Records Current and Passing (Y or N)					

Alarms, unusual operating conditions, and/or failed/inconclusive tests require immediate attention by the owner/operator or the Class A/B operator.

Sample Monthly walkthrough inspection checklist

Sample Annual walkthrough inspection checklist

12-Month Requirements

Containment Sumps	Tank No.	Tank No.	Tank No.	Tank No.	Tank No.
Damaged (Y or N)					
Clean & Dry (Y or N)					
Vacuum/Pressure Gauge Functioning (if applicable) (Y or N)					
Liquid Gauge Functioning (if applicable) (Y or N)					

Damaged containment, debris/liquid in containment, and/or malfunctioning gauges require immediate attention by the owner/operator or the Class A/B operator.

If applicable:

Handheld Release Detection Equipment (tank gauge stick or groundwater bailer) are whole, readable and functioning (Y or N)	
--	--

Comments: (Any item marked as deficient requires a comment explaining the steps taken to correct the deficiency.)

➤ FOI Compliance – Corrosion Protection

The Two Most Recent 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

As of December 21, 2022 all facilities should have been tested at least once. There are no more phase in periods to worry about when conducting an inspection.

Reminder

All new installations, replacements, and repairs of components that require periodic testing require properly documented testing at the completion of the installation, replacement or repair.

FOI Compliance – Periodic Testing

Important things to remember:

- All testing forms should include a Testing Certification Form
- Write legibly or Print/Type
- Identify the test method protocol and/or standard that was used
- Review the forms before signing the certification form and submitting
 - Maintain a copy and provide one to the facility
- Record the manufacturer and model information
- The owner needs to sign the certification form
 - The owner's representative signature proves the form was received by the appropriate individuals at the facility.

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 – 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>

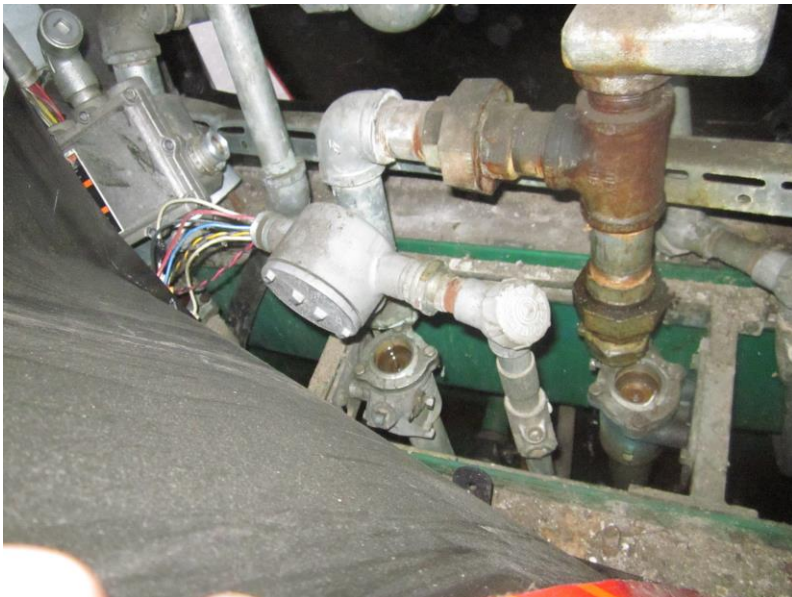
All Pressurized Piping:

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

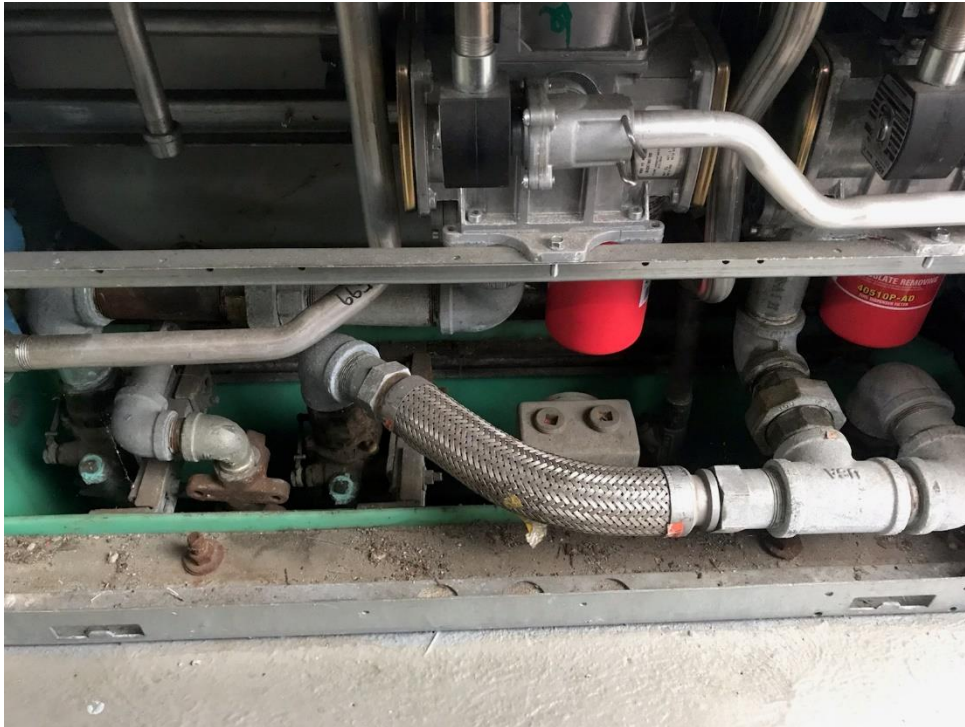
➤ Shear Valves and Piping Manifolds



➤ 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 ----

Financial Responsibility:

records showing the system participates in USTIF are available (paid USTIF invoices and/or fuel delivery receipts with USTIF fee)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

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.

Financial Responsibility

- **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 throughout 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.

PA UST Tax - Gasoline

9,001 GG

0.011000

99.01



Commonwealth of PA - USTIF
901 N 7th Street
Harrisburg, PA 17102

USTIF Capacity Fee Statement

Account Number	
Invoice Number	
Statement Date	01/04/2019
Due Date	01/31/2019
Total Due	\$3,135.00
Minimum Due	\$522.50

01/04/2019
01/31/2019
\$3,135.00
\$522.50

PLEASE SEE THE REVERSE SIDE FOR MORE INFORMATION

Transaction Date	Description	Amount	Balance
12/05/2018	Balance Forward		\$3,135.00
	Total Due		\$3,135.00
Past Due		\$261.25	
Monthly Payment		\$261.25	
Minimum Due		\$522.50	

Financial Responsibility – Capacity Fees

- The inspector can review the most recent Fee Statement issued to the facility by USTIF.
 - If there is a \$0.00 Balance or no Past Due amount, the account is most likely current
 - Past Due Amounts Owed will be in **RED**
- **Compliance Assessment for Capacity Fees:**
 - Nothing Past Due – **Compliant**
 - Past Due Amount – **Not Compliant**

Financial Responsibility

Financial Responsibility – Throughput Fees

- The inspector can review a recent Bill of Lading or Sales Invoice.
 - If there is a 0.011 fee assessed per gallon of product this is the USTIF fee
- **Compliance Assessment for Throughput Fees:**
 - **Compliant** - 0.011 fee assessed on the provided Bill of Lading or Sales Invoice - **Compliant**
 - **Not Compliant** - No 0.011 fee assessed – **Not Compliant**
 - Unless the facility can show other proof the fee has been paid to USTIF.
- **Examples will be provided on the next 2 slides**

Financial Responsibility

SALES INVOICE

Page 1 of 1

Sold To:

Shipped To:

Invoice Number:

Date: 12/3/2017

Federal ID:

EPA ID:

Origin: PITTSBURGH,PA-SPMT
Freight Terms: DEL

Contract Reference:

PO Number:

Tax Authority:

Date	Ticket/BOL	Carrier	Product Description	Octane	Quantity	UOB	Price	US Dollars
12/3/2017 05:43:00			87N REGULAR 10% ETH	87	7,901	GG	1.88010	14,854.67
12/3/2017 05:43:00			93N ULTRA 10% ETH	93	1,100	GG	2.26010	2,486.11
								17,340.78
Federal Gasoline LUST Tax					9,001	GG	0.001000	9.00
Federal Gasoline Tax					9,001	GG	0.183000	1,647.18
Federal Oil Spill Tax Cost Recovery - E10					9,001	GG	0.001929	17.36
PA Oil Franchise Tax - Gasoline					9,001	GG	0.582000	5,238.58
PA UST Tax - Gasoline					9,001	GG	0.011000	99.01

THIS VOLUME OF NEAT OR BLENDED ETHANOL IS DESIGNATED AND INTENDED FOR USE AS TRANSPORTATION FUEL OR JET FUEL IN THE 48 U.S. CONTIGUOUS STATES AND HAWAII. ANY PERSON EXPORTING THIS FUEL IS SUBJECT TO THE REQUIREMENTS OF 40 CFR 80.1430.

As of March 1, 2017 all

Invoice	Payment Terms	Due Date	Invoice Total
		Please refer to your draft notification	24,351.91

For any questions, please email

Please include the invoice number, a brief description of your inquiry and a contact name, phone number and email.

Financial Responsibility

INVOICE



Invoice Number: [REDACTED]
Invoice Date: [REDACTED]
Order Number: [REDACTED]
Order Date: 7/30/2018
Salesperson: [REDACTED]
Customer Number: [REDACTED]

Sold To:



Ship To:



Customer P.O.	Ticket Number	B.O.L. 01	Terms NET 30 DAYS			
Item Number	Unit	Ordered	Shipped	Back Ordered	Price	Amount
UL RFG UL RFG GAS 87	EACH	700.00	700.00	0.00	2.5439	1,780.73
SUPERFUND					0.00214	1.50
LUST					0.00100	0.70
					2.54704	1,782.93

FEDERAL LUST AND SUPERFUND TAXES ARE LISTED AS SEPARATE LINE ITEMS FOR ACCOUNTING PURPOSES ONLY.
THESE TAXES WERE INCLUDED IN THE PRICE PER GALLON QUOTED.

[REDACTED] IS A QUALIFIED SMALL BUSINESS
CONCERN AS DEFINED UNDER THE #4 PA CODE 2.32



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Class A & B Operator Training

- The EPA provided Class A & B operator test is not valid in PA.
- Any Class A & B operator certificates from the EPA are not in compliance for the Operator Training section.



Other Important Information

Important Notes for All Certified Individuals

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.

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*

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.

Compatibility Requirements

1. The form should be complete.

1. Extensive details and instructions are available on the form.

II (a). STORAGE TANK & PIPING INFORMATION – Sections II(a) and II(b) should be completed in full by the storage tank system owner and DEP certified tank installer. Type or print (in ink) all items. Provide the model/brand and equipment manufacturer for each storage tank system component. Write "NA" and check the corresponding box if the tank/piping/dispenser system does not have the component. Write "UNK" if the model/brand or equipment manufacturer cannot be determined. Check the appropriate box(es) to indicate whether or not the component has been confirmed by a Nationally Recognized Testing Laboratory (NRTL), such as Underwriters Laboratories (UL), and/or has been verified by the component manufacturer for use with the substance stored. Only check "No" if the component is neither NRTL listed nor manufacturer verified. Only one storage tank system per form may be listed.

DEP will not approve an operating permit for an alternative fuel storage tank system with "unknown" components, or components that are neither NRTL listed nor manufacturer verified for use with the substance stored, unless a PA licensed professional engineer (P.E.) who has knowledge, experience, and training in materials science determines in his/her professional judgment that those components satisfy the compatibility requirements listed in the Storage Tank Regulations in 25 Pa Code, Chapter 245. The P.E. must sign the certifying statement in Section IV. DEP may request documentation supporting the P.E. determination.

Please Note:

DEP will not approve an operating permit for an alternative fuel storage tank system with "unknown" components.

This is explicit on the form, please have your customer read it for themselves if they have problems understanding.

We review the entire component list for every application.

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.

Tank Removal/ Closure

- A Closure Report and an Amended Registration/Permitting Form are required for these activities.
- UMR/AFR/AMR should be used, and the documents should be signed by the Remover and submitted to the appropriate offices.
 - If the Amended Registration for a closure or removal is not submitted to Central Office, the tank(s) will remain active, and the registration fee will continue to be applied to the tank(s).

➤ 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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DEPARTMENT OF ENVIRONMENTAL
PROTECTION

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.*

Online Registration - ePermits

Information and user guides available online

Go to www.dep.pa.gov

Search: Storage Tanks e-permitting

New functionality is being added in the coming months, such as:

Quick Pay (no Greenport login required)

Certified installer/company access (to prepare registrations for tank owners)

Ownership changes

[DEP](#) > [Businesses](#) > [Land](#) > [Storage Tanks](#) > ePermitting

ePermitting

Online Registration and Fee Payment Instructions

Storage tank owners may now pay annual Storage Tank registration fees and submit the below listed storage tank registration amendments online through the Department's ePermitting application on Greenport. Follow the steps below to create a Greenport account and access the ePermitting application. Contact the Division of Storage Tanks at 717-772-5599 with any questions.

ePermitting - Storage Tanks

[Department of Environmental Protection](#) > [Business](#) > [Land](#) > [Tanks](#) > [Pages](#) > ePermitting



ePermitting. Online Registration and Fee Payment Instructions. **Storage tank** owners may now pay annual **Storage Tank** registration fees and submit the below ...



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GreenPort Account

To submit registration amendments, and to pay registration fees at this time, a DEP Greenport account is required. Click the Register button to create a new account.

<https://greenport.pa.gov>

Existing GreenPort users can tie their account to storage tank facilities by using the self-enrollment process or by contacting the Storage Tank program at 717-772-5599 or tanks@pa.gov.

Welcome to the new GreenPort powered by the PA Keystone Login!



Department of
Environmental Protection



Department of Conservation
and Natural Resources



Pennsylvania Department
of Agriculture



Milk Marketing Board

Login to your account

Note: Do not use your Old DEP GreenPort account created before 03/20/2021.

Username

Password

Login

[What is GreenPort?](#)

[Forgot Username?](#)

[Forgot Password?](#)

[Need your account unlocked?](#)

Register a new GreenPort account

Register

When you register a new GreenPort account, you automatically create a new Keystone Login account.

PA Keystone Login is an account management system for commonwealth online services. You can use your PA Keystone Login username and password to log into any online service that participates in PA Keystone Login.



Powered by

PA KEYSTONE LOGIN

[Keystone Login FAQ](#)

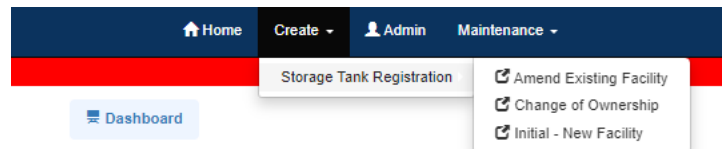


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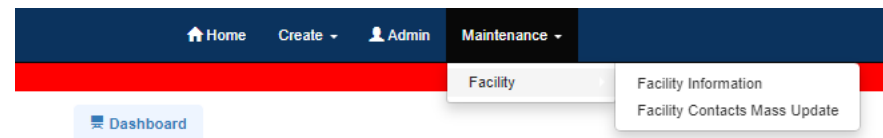
Online Registration - ePermits

Advantages of using e-permitting

- Much faster processing of registration amendments (new tanks, etc.)
- Your registration/permit certificate is available for download immediately following payment
- Update contact information immediately
- Registration/permit certificate is always available if you need an additional copy
- Confirm DEP receipt of application and track its progress
- Payments and contact updates can be made in bulk (multiple facilities at one time)



ePermit Dashboard



ePermit Dashboard



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Environmental Cleanup and Brownfields
Division of Storage Tanks
Rachel Carson State Office Building
P.O. Box 8762
Harrisburg, Pennsylvania 17105-8762
In PA: 1-800-42-TANKS
Outside PA: 717-772-5599



All tank owners shall have the current valid Storage Tank Registration/Permit Certificate available at the facility where the tank(s) is located and for inspection by the Department, certified storage tank inspector or installer, and product distributor. At Retail Sales Facilities, the certificate (or copy) shall be publicly displayed at the facility where the tank(s) is located.

STORAGE TANK REGISTRATION/PERMIT CERTIFICATE EXPIRATION: 06/04/2023

TANK ID	SEQ#	CAPACITY	SUBST	PERMIT TYPE	PERMIT STATUS	AST IN-SVC INSP DUE	AST OUT-OF-SVC INSP DUE	UST OPERATIONS INSP DUE	LINING INSP DUE
596969	001	20,000	DIESEL	OPR	Approved			10/21/2018	
596970	002	2,500	NMO	OPR	Approved			10/21/2018	
596971	003	1,000	USDOL	OPR	Approved			10/21/2018	

Client ID:
Owner Type:
Id:

PACOR
[REDACTED]
[REDACTED]
[REDACTED]

Site ID:
Facility Kind:
Facility Id:

RETGO
[REDACTED]
[REDACTED]
[REDACTED]

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 Gov
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		
Site Location)			Facility Location Line 2			
State			ZIP+4			
Latitude			Longitude			
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds	
Feet			Meters			



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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
- Applications must be attached in **PDF** format

SECTION II – APPLICATION TYPE

☐ FIRST certification request

☐ MODIFY/ADD certification

☐ RENEW certification

Certification Examinations

- New Vendor



- Online Examination
- Must submit complete application to DEP at least 60-days prior to desired exam date.
- After DEP approves applicant for testing, applicant will receive both an approval email and letter from DEP
- Vendor will email applicant with instructions about paying for and accessing the exam
- Fee is \$75 per exam
- Exam can be scheduled any time (24/7) with the exception of some holidays.



Certification Examinations

- Examinee needs:
 - Computer with webcam
 - Secondary camera (i.e. smartphone)
 - Government ID (drivers license, etc.)
- Examinee is connected to a live proctor who will provide instructions and monitor the exam.
- Work surface must be cleared. No other people or pets allowed in room where applicant is taking the exam.
- Results are not received immediately after testing:
 - DEP provides results to examinee within 10 business days.
 - 80% still needed to pass

Certification Examinations

– Administrative Exam:

- Still only needed for first-time applicants
- Timed to 1 hour (was previously 45 minutes)
- Still open book
- Hard copies of Chapter 245 and Storage Tank and Spill Prevention Act will be mailed to applicants.
- During the exam, the documents must be accessed online via a link. Paper copies may not be used.

– For questions contact the certification unit:

- Anne Toth anntoth@pa.gov 717-772-5808
- Wendy Davis wendavis@pa.gov 717-772-5829



Certification Reminders

DEP communicates frequently by email.

DEP encourages you to communicate with us by email:

tanks@pa.gov

Notify DEP of changes:

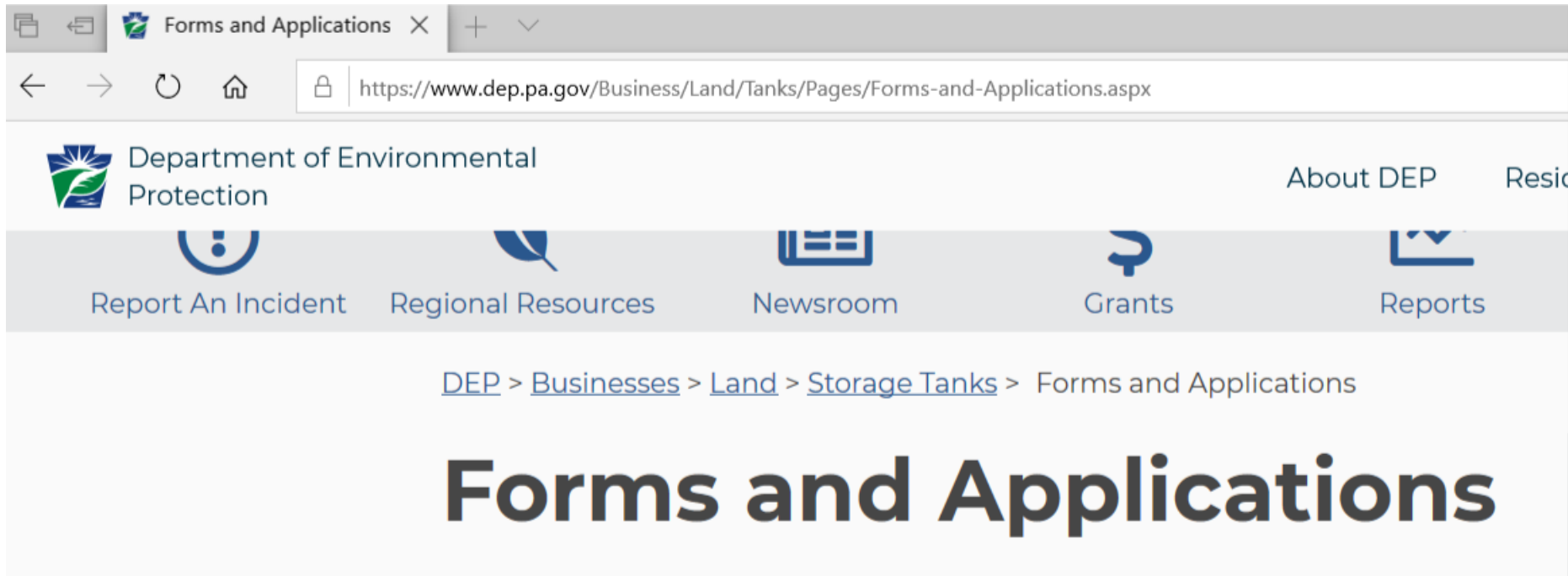
Address

Employer

Email

Certification Reminders

Use the most recent revision of DEP's forms.



A screenshot of a web browser displaying the DEP Forms and Applications page. The browser's address bar shows the URL <https://www.dep.pa.gov/Business/Land/Tanks/Pages/Forms-and-Applications.aspx>. The page header includes the DEP logo and the text "Department of Environmental Protection". A navigation bar contains links for "Report An Incident", "Regional Resources", "Newsroom", "Grants", and "Reports". Below the navigation bar, a breadcrumb trail reads: [DEP](#) > [Businesses](#) > [Land](#) > [Storage Tanks](#) > Forms and Applications. The main heading of the page is "Forms and Applications".

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 _____ Zip _____



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Bureau of Environmental Cleanup & Brownfields



Questions?

Danielle Mattive

717-772-5830

dmattive@pa.gov