

06/03/2026

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

Re: Petition for Rulemaking – Amendment to 25 Pa. Code Chapter 245 Administration of the Storage Tank and Spill Prevention Program

Members of the Environmental Quality Board:

On behalf of TechKnowServ Corp., I respectfully submit the enclosed Petition for Rulemaking requesting amendments to 25 Pa. Code Chapter 245 to establish material-specific inspection requirements for fiberglass reinforced plastic (FRP) aboveground storage tanks and to recognize Acoustic Emission Testing (AET) as a required integrity assessment methodology for these assets.

Founded in Pennsylvania more than two decades ago, TechKnowServ Corp. has become one of the Commonwealth's leading providers of storage tank inspection, nondestructive testing, engineering, and environmental compliance services. Our firm has supported industrial facilities, utilities, municipalities, petroleum operators, chemical manufacturers, data centers, and government agencies throughout Pennsylvania and across the United States in maintaining safe and environmentally responsible storage tank systems.

Our team includes Pennsylvania licensed Professional Engineers, certified storage tank inspectors, and environmental professionals with extensive experience evaluating metallic, fiberglass reinforced plastic (FRP), and polyethylene storage tanks. TechKnowServ personnel maintain certifications as IAM and IAF tank inspectors, AMNX-certified storage tank installers, and Qualified Professionals (QP) under the Pennsylvania Department of Environmental Protection's SPEED Program. Through these qualifications, we routinely assist facility owners with storage tank permitting, registration, inspection, integrity assessment, closure activities, and regulatory compliance throughout the Commonwealth.

Over the course of our work, we have observed a significant regulatory gap regarding the inspection of FRP aboveground storage tanks. While metallic tanks are commonly evaluated using established inspection methodologies focused on corrosion and wall loss, FRP tanks experience fundamentally different degradation mechanisms including fiber breakage, matrix cracking, delamination, and structural fatigue. These conditions are often not adequately addressed through inspection methods originally developed for metallic tank systems.

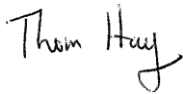
Neighboring states, including New Jersey, have already recognized this distinction by requiring Acoustic Emission Testing in accordance with ASTM E1067 for FRP aboveground storage tanks. New York State Department of Environmental Conservation guidance similarly recognizes Acoustic Emission Testing as an accepted methodology for evaluating FRP tank integrity. Pennsylvania currently lacks comparable material-specific inspection requirements despite the widespread use of FRP storage systems throughout the Commonwealth.

The proposed amendment seeks to improve environmental protection, enhance public safety, provide clearer guidance to tank owners and inspectors, and harmonize Pennsylvania's regulations with established regional practices. We believe the proposed changes will improve the detection of structural degradation in FRP tanks before failures occur, thereby reducing the risk of releases to soil, groundwater, and surface waters.

TechKnowServ respectfully requests that the Environmental Quality Board consider the enclosed petition and initiate the rulemaking process necessary to evaluate and adopt these proposed amendments. We would welcome the opportunity to provide technical information, industry data, inspection experience, and stakeholder input that may assist the Board and the Department in their review.

Thank you for your consideration of this petition and for your continued commitment to protecting Pennsylvania's environment and communities.

Respectfully submitted,

A handwritten signature in black ink that reads "Thom Hay". The signature is written in a cursive, slightly informal style.

Thomas R. Hay, Ph.D., P.E.
President

**COMMONWEALTH OF PENNSYLVANIA
ENVIRONMENTAL QUALITY BOARD**

PETITION FORM

I. PETITIONER INFORMATION

Name: TechKnowServ Corporation

Mailing Address: 498 Meckley RD State College, PA 16801

Telephone Number: 814-237-0144

Date: 2/12/2026

II. PETITION INFORMATION

A. The petitioner requests the Environmental Quality Board to (check one of the following):

☐ Adopt a regulation

☒ Amend a regulation (Citation §245.552 In-service Inspection)

☐ Repeal a regulation (Citation _____)

Please attach suggested regulatory language if request is to adopt or amend a regulation.

B. Why is the petitioner requesting this action from the Board? (Describe problems encountered under current regulations and the changes being recommended to address the problems. State factual and legal contentions and include supporting documentation that establishes a clear justification for the requested action.)

Existing Regulatory Gap

Current Chapter 245 requirements do not clearly distinguish between metallic and FRP aboveground storage tanks when establishing inspection and integrity assessment requirements.

As a result:

Tank owners receive limited guidance regarding appropriate inspection methodologies.

Inspection practices vary significantly among facilities. Technologies developed primarily for metallic tanks are sometimes applied to composite tanks despite differing failure mechanisms.

Technical Basis

Metallic tanks typically experience degradation through:

- Corrosion
- Pitting
- Erosion
- Wall thinning

These mechanisms are effectively evaluated through:

- Ultrasonic thickness testing
- Visual inspection
- Magnetic particle testing
- Radiographic testing

FRP tanks fail through substantially different mechanisms:

- Fiber fracture
- Matrix cracking
- Delamination
- Resin degradation
- Stress corrosion cracking
- Progressive structural damage

Many of these conditions may not be adequately identified through conventional metallic tank inspection methods.

ENVIRONMENTAL BENEFITS

The proposed amendment would:

- Improve early identification of structural degradation
- Reduce risk of chemical releases
- Reduce groundwater contamination events
- Improve environmental protection
- Increase consistency in tank inspection practices
- Improve regulatory clarity

ECONOMIC IMPACT

The proposed amendment is expected to have minimal economic impact because:

- Acoustic emission testing is conducted while tanks remain in service.
- Reduced downtime can offset inspection costs.
- Early defect detection can prevent catastrophic failures and expensive environmental remediation.
- Clear inspection requirements reduce uncertainty for tank owners and inspectors.

PUBLIC HEALTH AND SAFETY BENEFITS

The amendment would:

- Improve storage tank reliability.
- Reduce release incidents.
- Protect workers.
- Protect surrounding communities.
- Enhance environmental stewardship

REFERENCES

You may attach supporting references such as:

- ASTM E1067 – Standard Practice for Acoustic Emission Examination of Fiberglass Reinforced Plastic Resin (FRP) Tanks/Vessels.
- ASTM E1118 – Acoustic Emission Examination of Reinforced Thermosetting Resin Pipe Systems.
- API 653 (discussion of material-specific inspection practices).
- ASME RTP-1 (Reinforced Thermoset Plastic Corrosion-Resistant Equipment).
- PEI/RP200 and STI guidance documents.
- Historical release incident data involving FRP storage systems.
- Pennsylvania DER guidance documents related to storage tank integrity assessments.

Regulatory Precedent in Neighboring States

New Jersey Regulatory Framework

The State of New Jersey has already established material-specific integrity testing requirements for aboveground storage tanks under N.J.A.C. 7:1E. New Jersey's regulations differentiate tank inspection requirements based upon tank construction materials and specifically recognize ASTM E1067 Acoustic Emission Testing for Fiberglass Reinforced Plastic (FRP) tanks.

New Jersey's published "Guide to the Inspection and Testing of Aboveground Storage Tanks" further requires FRP aboveground storage tanks to undergo integrity testing every five years utilizing acoustic emission testing in accordance with ASTM E1067.

This demonstrates that:

Acoustic emission testing is an established regulatory practice.

Material-specific inspection requirements are practical and enforceable.

State environmental agencies have already determined that FRP tanks require different inspection methodologies than metallic tanks.

New York State Regulatory Framework

The New York State Department of Environmental Conservation (NYSDEC) recognizes Acoustic Emission Testing as an accepted and recommended inspection methodology for fiberglass reinforced plastic tanks.

NYSDEC's Standards and Practices for Bulk Storage specifically reference:

ASTM E1067 – Standard Practice for Acoustic Emission Examination of Fiberglass Reinforced Plastic Resin (FRP) Tanks/Vessels
Recommended Practice for Acoustic Emission Testing of Fiberglass Reinforced Plastic Resin Tanks/Vessels
ASME RTP-1 Reinforced Thermoset Plastic Equipment standards

as accepted technical references for FRP storage systems.

The inclusion of these standards by NYSDEC reflects industry recognition that FRP equipment exhibits degradation mechanisms fundamentally different from steel tanks and therefore requires specialized inspection methodologies.

Why Pennsylvania Should Act

Pennsylvania currently regulates aboveground storage tanks under a largely material-neutral framework. While this approach may be adequate for metallic tanks where wall loss and corrosion are primary degradation mechanisms, it does not adequately address the unique failure mechanisms associated with composite storage systems.

Suggested Addition to Chapter 245

§245.____ Inspection Requirements for FRP Aboveground Storage Tanks

Owners and operators of fiberglass reinforced plastic (FRP) aboveground storage tanks shall conduct periodic integrity assessments utilizing nondestructive examination methods specifically capable of detecting structural degradation mechanisms associated with composite materials.

Acceptable methods shall include:

- Acoustic Emission Testing (AET)
- Other Department-approved technologies demonstrated to provide equivalent detection capability for:
 - Delamination
 - Fiber breakage
 - Matrix cracking
 - Structural degradation
 - Progressive damage mechanismsAcoustic Emission Testing shall be recognized as a primary inspection methodology for FRP tank integrity assessments due to its ability to evaluate the entire structure while in service.

C. Describe the types of persons, businesses and organizations likely to be impacted by this proposal.

The proposed amendment would primarily impact owners and operators of fiberglass reinforced plastic (FRP) aboveground storage tanks regulated under Pennsylvania's Storage Tank and Spill Prevention Program. These facilities include chemical manufacturers, water and wastewater treatment facilities, electric utilities, data centers, industrial processing facilities, petroleum terminals, agricultural operations, food processing facilities, and other commercial or industrial establishments utilizing FRP tanks for the storage of regulated substances.

The proposal would also affect environmental consulting firms, tank inspection companies, professional engineers, nondestructive examination service providers, and contractors performing storage tank

integrity assessments. Inspection personnel may require additional training or qualifications related to Acoustic Emission Testing (AET) and ASTM E1067 inspection practices.

The Pennsylvania Department of Environmental Protection would benefit from improved consistency in inspection methodologies and clearer regulatory guidance regarding integrity assessments for FRP storage tanks. The proposal would reduce ambiguity regarding appropriate inspection methods for composite tanks and align Pennsylvania's regulatory framework more closely with neighboring states.

The general public, surrounding communities, property owners, and environmental stakeholders would also be positively impacted through improved detection of structural degradation mechanisms unique to FRP tanks, including delamination, fiber breakage, matrix cracking, and bond failures. Earlier identification of these conditions may reduce the likelihood of releases that could adversely affect soil, groundwater, surface water, public health, and environmentally sensitive areas.

The proposed amendment is not expected to significantly impact owners of metallic aboveground storage tanks because existing inspection requirements for steel tanks would remain unchanged. Rather, the amendment establishes material-specific inspection requirements recognizing that FRP tanks exhibit fundamentally different degradation mechanisms than metallic tanks and therefore require specialized integrity assessment techniques.

The proposal is modeled after regulatory approaches already adopted by the New Jersey Department of Environmental Protection, which requires FRP aboveground storage tanks greater than 2,000 gallons to undergo acoustic emission testing every five years in accordance with ASTM E1067, together with internal and external inspections. New York State Department of Environmental Conservation guidance similarly recognizes ASTM E1067 Acoustic Emission Testing as an accepted inspection methodology for FRP tanks. Adoption of comparable requirements in Pennsylvania would promote regional consistency and improve environmental protection while providing clear expectations to tank owners and inspectors.

D. Does the action requested in the petition concern a matter currently in litigation? If yes, please explain.

NO

E. For stream redesignation petitions, the following information must be included for the petition to be considered complete. Attach supporting material as necessary.

(Not applicable)

1. A clear delineation of the watershed or stream segment to be redesignated, both in narrative form and on a map.
2. The current designated use(s) of the watershed or segment.
3. The requested designated use(s) of the watershed or segment.
4. Available technical data on instream conditions for the following: water chemistry, the aquatic community (benthic macroinvertebrates and/or fishes), or instream habitat. If such data are not included, provide a description of the data sources investigated.
5. A description of existing and proposed point and nonpoint source discharges and their impact on water quality and/or the aquatic community. The names, locations, and permit numbers of point source discharges and a description of the types and locations of nonpoint source discharges should be listed.
6. Information regarding any of the qualifiers for designation as high quality waters (HQ) or exceptional value waters (EV) in §93.4b (relating to qualifying as High Quality or Exceptional Value waters) used as a basis for the requested designation.
7. A general description of land use and development patterns in the watershed. Examples include the amount or percentage of public lands (including ownership) and the amount or percentage of various land use types (such as residential, commercial, industrial, agricultural and the like).
8. The names of all municipalities through which the watershed or segment flows, including an official contact name and address.
9. Locational information relevant to items 4-8 (except for contact names and addresses) displayed on a map or maps, if possible.

**All petitions should be submitted to the
Secretary of the Department of Environmental Protection
P.O. Box 2063
Harrisburg, PA 17105-2063**

Appendix A

Supporting Technical and Regulatory References for FRP/Nonmetallic Aboveground Storage Tank Integrity Inspections

A.1 Purpose

This appendix supports a proposed amendment to 25 Pa. Code Chapter 245 that would require periodic integrity inspections of fiberglass reinforced plastic (FRP), homogeneous plastic, polyethylene, XLPE, and other nonmetallic aboveground storage tanks (ASTs).

The amendment is needed because nonmetallic tanks do not degrade the same way steel tanks do. Corrosion-rate-based inspection methods — the foundation of most metallic tank programs — do not reliably identify the structural damage mechanisms that affect FRP and plastic tanks. A material-specific inspection requirement is therefore necessary to protect against failure and environmental release.

A.2 ASTM E1067/E1067M — Acoustic Emission Examination of FRP Tanks

ASTM E1067/E1067M is the recognized nondestructive examination standard for FRP tanks and vessels. It covers acoustic emission testing conducted while the tank is subjected to pressure, vacuum, hydrostatic load, or other controlled service-related stress.

The standard is significant because it measures active structural response rather than simply measuring wall thickness. When an FRP laminate is stressed, damage mechanisms within the composite structure emit detectable acoustic signals. ASTM E1067 provides a systematic method for capturing and interpreting those emissions.

The damage mechanisms ASTM identifies as detectable by acoustic emission include:

- Resin cracking
- Fiber debonding
- Fiber pullout
- Fiber breakage
- Delamination
- Bond failure at assembled joints such as nozzles and manways

These mechanisms are fundamentally different from the wall thinning and pitting that govern metallic tank inspection. ASTM E1067 is appropriate as Pennsylvania's required NDE method for regulated FRP ASTs because it addresses FRP structural integrity directly rather than relying on external visual conditions alone.

A.3 New Jersey Regulatory Model

New Jersey provides the most directly applicable neighboring-state precedent. The governing rule is N.J.A.C. 7:1E-2.16, Integrity Testing.

New Jersey requires FRP ASTs greater than 2,000 gallons to undergo integrity testing on a five-year cycle. Each inspection consists of acoustic emission testing per ASTM E1067, combined with internal and external inspection of the tank and appurtenant structures by a qualified, experienced inspector.

Homogeneous plastic tanks greater than 2,000 gallons are subject to a separate five-year requirement

consisting of internal and external visual inspection by a qualified inspector.

New Jersey’s rule also establishes a clear enforcement consequence: a tank that fails the applicable structural integrity standard, or that presents a condition threatening structural integrity, must be taken out of service until repaired or replaced.

On the definitional side, New Jersey references ASTM E1067 as “ASTM’s standard practice for acoustic emission examination of FRP tanks/vessels, as amended and supplemented.” This approach avoids locking the regulation to a single edition of the standard, which is a useful drafting model for Pennsylvania.

Proposed Pennsylvania inspection requirements, modeled on New Jersey’s framework:

Tank Type	Proposed Inspection Requirement
FRP AST > 2,000 gallons	Five-year integrity inspection using ASTM E1067/E1067M acoustic emission testing, plus internal and external inspection.
Homogeneous plastic / polyethylene / XLPE AST > 2,000 gallons	Five-year internal and external visual inspection, foundation/support inspection, appurtenance inspection, and additional NDE or engineering evaluation were warranted.
Failed or structurally questionable tank	Remove from service until repaired, replaced, or accepted by engineering evaluation and DEP requirements.

A.4 NYSDEC References

The New York State Department of Environmental Conservation (NYSDEC) provides additional regulatory support for material-specific inspection requirements for nonmetallic and plastic tank systems.

NYSDEC bulk storage standards reference multiple FRP and plastic tank standards, including ASTM D2996, ASTM D3299, ASTM D4097, ASTM E1067, ASME RTP-1, and TAPPI guidance for inspecting used FRP equipment. The range of standards referenced reflects an underlying regulatory posture that FRP and plastic storage equipment requires a separate technical framework from metallic systems.

Standard / Guidance	Relevance
ASTM D2996	Filament-wound reinforced thermosetting resin pipe.
ASTM D3299	Filament-wound glass-fiber-reinforced thermoset resin corrosion-resistant tanks.
ASTM D4097	Contact-molded glass-fiber-reinforced thermoset resin chemical-resistant tanks.
ASTM E1067 ASME RTP-1	Acoustic emission examination of FRP tanks/vessels. Reinforced thermoset plastic corrosion-resistant equipment.
TAPPI TIP 0402-28	Guidance for inspecting used FRP equipment.

A.4.1 Chemical Bulk Storage Structural Requirements

New York's hazardous substance bulk storage rules require tanks to be structurally adequate for normal handling and use, compatible with the stored substance, resistant to wear, vibration, shock, and corrosion, and supported on a stable foundation. For FRP specifically, New York requires sufficient density and strength to form a hard, impermeable shell that will not crack, wick, wear, soften, or separate under normal service conditions.

New York also recognizes ASTM D4097 and ASTM D3299 as acceptable design and construction standards for aboveground hazardous substance tank systems.

A.4.2 Five-Year Inspection Policy for Plastic Tanks (DER-16)

NYSDEC DER-16 provides guidance for the five-year inspection of homogeneous plastic aboveground tank systems under the Chemical Bulk Storage program. Although DER-16 excludes fiberglass tanks from its definition of homogeneous plastic, its inspection framework is relevant to Pennsylvania rulemaking because it confirms the established regulatory concept that nonmetallic tanks require inspection logic different from what governs metallic systems.

NYSDEC's inspection scope under DER-16 covers system tightness, structural soundness, evidence of wear, foundation integrity, operability, controls, remaining useful life, and applicable nondestructive test methods.

A.5 FRP Failure Mechanisms

Steel tank inspections center on corrosion, pitting, wall thinning, weld defects, and remaining-thickness calculations. FRP tanks require different inspection logic because their structural degradation occurs through the resin matrix, fiber reinforcement, laminate interfaces, corrosion barrier, bonded joints, nozzles, manways, and support interfaces — not through simple wall loss.

The following mechanisms are those ASTM E1067 identifies as detectable by acoustic emission. Each has distinct causes and implications for inspection scope.

A.5.1 Resin Cracking

Cracks in the polymer matrix develop under stress, overloading, cyclic loading, thermal movement, chemical exposure, UV degradation, or impact. In FRP tanks, resin cracking matters because it can compromise the corrosion barrier and allow stored chemicals to migrate deeper into the laminate.

Surface crazing may be visible on external inspection, but internal laminate cracking often is not. Acoustic emission testing detects active cracking when the tank is loaded.

A.5.2 Fiber Debonding

When the bond between the glass fibers and the resin matrix degrades, load transfer between the two materials is reduced. Debonding can result from chemical attacks, excessive strain, thermal cycling, manufacturing defects, or fatigue. Because it can reduce structural efficiency without producing visible wall loss, debonding may not be caught by visual inspection alone.

A.5.3 Fiber Pullout

Fiber pullout occurs when glass fibers separate from the resin during damage progression. It is associated

with composite fracture, impact, delamination, or advanced laminate degradation. Acoustic emission activity under load is a recognized indicator.

A.5.4 Fiber Breakage

Glass fiber carries a major share of tensile load in an FRP laminate. Fiber breakage can result from overload, impact, excessive hoop stress, improper support, stress concentrations, nozzle loading, cyclic fatigue, or loss of the fiber-resin bond. It is structurally significant and is one of the primary mechanism's acoustic emission testing is designed to detect.

A.5.5 Delamination

Delamination is separation between laminate layers. It may stem from manufacturing defects, impact, thermal cycling, chemical attack, overpressure, vacuum damage, poor bonding, or cyclic stress. Delamination can reduce stiffness, allow liquid migration, and create localized weakness — often without presenting as an obvious wall-thinning condition.

A.5.6 Bond Failure at Nozzles, Manways, and Appurtenances

Bonded nozzles, manways, flanges, fittings, and lifting lugs are stress concentration points. Bond failure can result from piping loads, vibration, unsupported piping, misalignment, impact, thermal movement, poor original fabrication, or chemical degradation. Failure at these locations can create leakage or structural instability even when the main shell appears sound, so they warrant specific attention during inspection.

A.5.7 Chemical Attack and Corrosion Barrier Degradation

FRP tanks are frequently selected for their chemical resistance, but the resin system and corrosion barrier must be compatible with the stored substance, concentration, temperature, and exposure conditions. Chemical attack can soften, blister, crack, swell, or degrade the liner. Once the corrosion barrier is compromised, chemical exposure can progress into the structural laminate.

Internal inspection is critical where safe access is available. Signs of chemical attack include blistering, softening, discoloration, fiber exposure, liner cracking, weeping, and loss of surface hardness.

A.5.8 UV and Weathering Degradation

Outdoor FRP tanks can degrade from ultraviolet exposure, thermal cycling, and surface erosion. UV degradation typically begins at the resin-rich exterior surface but can progress to fiber exposure if unaddressed. External inspection should specifically look for chalking, fiber bloom, exposed fibers, loss of coating or topcoat, cracking, and weathering at the shell, roof, knuckle areas, nozzles, and supports.

A.5.9 Foundation, Support, and Settlement-Related Damage

Uneven support, settlement, point loading, poor foundation design, inadequate saddle support, tank rocking, or excessive piping loads can all introduce localized stresses that a corrosion-based inspection would not flag. Inspection scope should include the tank foundation, pad, saddles, anchor points, supports, evidence of settlement, piping loads, and visible distortion.

A.5.10 Vacuum and Overpressure Damage

Improper venting, blocked vents, vacuum conditions, overfilling, pressure excursions, or heat exposure can cause buckling, shell distortion, laminate cracking, roof deformation, or bond failure. Inspections should verify venting, overflow protection, vacuum and pressure protection, shell roundness, roof

condition, and relevant operating history.

A.6 Why These Mechanisms Support a Code Amendment

The damage mechanisms described above are not reliably identified by the corrosion-focused methods used for metallic tank inspection. A steel tank can often be evaluated by measuring remaining wall thickness, calculating corrosion rate, and comparing that to a code-required minimum. That approach does not translate to FRP tanks, where the critical degradation may be internal laminate damage, delamination, bond failure, or corrosion barrier deterioration — none of which produces simple wall loss.

Pennsylvania should therefore not rely on generic AST inspection language for FRP/nonmetallic tanks. The proposed Chapter 245 amendment should expressly require:

- ASTM E1067/E1067M acoustic emission testing for FRP tanks greater than 2,000 gallons
- Internal inspection where safely accessible
- External inspection of the foundation and supports, nozzles, manways, appurtenances, and secondary containment
- A five-year maximum inspection interval
- Removal from service when a tank fails structural integrity requirements or presents a condition threatening structural integrity
- Standardized reporting to PADEP to build Pennsylvania-specific FRP/nonmetallic tank condition data

A.7 Conclusion

ASTM E1067/E1067M provides a recognized and technically appropriate method for evaluating the structural integrity of FRP tanks and vessels. New Jersey already requires five-year ASTM E1067 acoustic emission testing for FRP aboveground storage tanks greater than 2,000 gallons under N.J.A.C. 7:1E-2.16. NYSDEC bulk storage guidance independently recognizes FRP and plastic tank standards and supports material-specific inspection requirements for nonmetallic systems.

Because FRP tanks degrade through laminate-specific mechanisms rather than metallic corrosion, Pennsylvania's existing inspection framework does not adequately address them. Amending 25 Pa. Code Chapter 245 to require five-year FRP integrity inspections — using ASTM E1067/E1067M combined with internal and external inspection by a qualified inspector — is technically supported, consistent with neighboring-state practice, and necessary to protect against FRP tank failure.

A.8 References

ASTM International. ASTM E1067/E1067M, Standard Practice for Acoustic Emission Examination of Fiberglass Reinforced Plastic Resin Tanks/Vessels. https://www.astm.org/e1067_e1067m-18.html

New Jersey Administrative Code. N.J.A.C. 7:1E-2.16, Integrity Testing. <https://www.law.cornell.edu/regulations/new-jersey/N-J-A-C-7-1E-2-16>

New Jersey Administrative Code. N.J.A.C. 7:1E-1.6, Definitions. <https://www.law.cornell.edu/regulations/new-jersey/N-J-A-C-7-1E-1-6>

NYSDEC. Standards and Practices for Bulk Storage. <https://dec.ny.gov/environmental->

protection/hazardous-substance-bulk-storage/standards-practices

NYSDEC. DER-26, How to Prepare a Spill Prevention Report for a Chemical Bulk Storage Facility.
https://extapps.dec.ny.gov/docs/remediation_hudson_pdf/der26.pdf

NYSDEC. 6 NYCRR Part 598, Handling and Storage of Hazardous Substances.
<https://dec.ny.gov/sites/default/files/2024-01/part598.pdf>

NYSDEC. DER-16, Five-Year Inspection of Plastic Tanks. <https://dec.ny.gov/regulatory/regulations/five-year-inspection-of-plastic-tanks-der-16>