

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Environmental Cleanup & Brownfields

Welcome to the 2018 Underground Storage Tank Inspector Seminar

Introductions

Central Office Staff

- **Randy Martin**- Environmental Group Manager - Supervisor of the Compliance and Enforcement Section (AST and UST Units)
- **Joshua Blanco** - Solid Waste Program Specialist - UST Unit
- **Patrick Sosik** - Solid Waste Specialist - UST Unit
- **Anne Toth** - Solid Waste Program Specialist - Certification & Permitting Unit

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Introductions

Regional Office Staff

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Ground Rules

- Please turn all cell phones and electronic devices to vibrate or silent mode.
- If there is an emergency, proceed to the closest emergency exit and gather outside. Generally, following the DEP regional staff is the way to go.
- Ask questions and interact! We are all here to learn from each other. This is your time to ask questions to the DEP technical staff.

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Let’s start with:

Administrative Information

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Receiving credit for this training

- ✓ **Sign in upon arrival in the classroom and obtain handouts**
- ✓ **If asked please present credentials**
  - **Certification Card**
  - **Photo ID**
- ✓ **<u>Remain for the entire training session</u>**
- ✓ **Obtain your training certificate**

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Central Office – UST Technical Staff

- **Kris Shiffer** - Environmental Program Manager - Supervisor of the Division of Storage Tanks
- **Randy Martin** - Environmental Group Manager - Supervisor of the Compliance and Enforcement Section (AST and UST Units)
- **Vacant** - Solid Waste Program Specialist - Supervisor of the UST Unit
- **Vacant** - Solid Waste Program Specialist - Compliance and Enforcement Section (AST and UST Units)

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Central Office – UST Technical Staff

- **Joshua Blanco** - Solid Waste Specialist - Responsible for Regions 2, 3, 6 (NE, SC, NW)
- **Patrick Sosik** - Solid Waste Specialist - Responsible for Regions 1, 4, 5 (SE, NC, SW)
- **Salma Chowdhury** – Environmental Trainee

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Central Office – Certification and Permitting Staff

- **Eric Lingle** - Environmental Group Manager - Supervisor of the Registration, Permitting & Certification Section
- **Anne Toth** - Solid Waste Program Specialist - Certification & Permitting Unit
- **Wendy Davis** - Administrative Assistant 1 - Certification & Permitting Unit

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Why are we here?

§ 245.21 – Tank Handling and Inspection Activities

- **Tank handling activities shall be conducted by a certified installer**
- **Storage tank facilities shall be inspected by a certified inspector**

§ 245.31 – Tightness Testing

- **Shall be conducted by a Department-certified UTT**
- **As of November 10, 2008 line testing requires UTT certification**

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Why are we here?

§ 245.114 – Renewal and Amendment of Certification

- **…certifications are valid for 3 years… (certified individuals must go through the renewal process every 3 years)**

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Why are we here?

- **§ 245.114(c) An applicant shall meet the following minimum training requirements…for renewal of *tank handling* certification.**
- **§ 245.114(d) An applicant shall meet the following minimum requirements…for renewal of *tank inspector* certification.**

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Why are we here?

For tank handlers:

One (1) of the requirements is attendance at any DEP-provided administrative training session. You must attend within the 24 month period preceding your submission of an application requesting renewal of tank handling certification.

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Why are we here?

For tank inspectors:

One (1) of the requirements is attendance at a DEP-provided inspector training session (technical seminar). You must attend within the 24 month period preceding your submission of an application requesting renewal of tank inspector certification.

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Certification Renewal

Requirements for Tank Handlers

For Categories:	3 Requirements:
UMX UMR AMMX AMNX AMR AFMX AFR AMEX ACVL	• Technical Training or Retest for Each Certification Category • Administrative Training • Application

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Certification Renewal

Requirements for Tank Handlers

For Categories:	3 Requirements:
UTT	• Maintain Current Certification with Testing Equipment Manufacturer (ex. Estabrooks, Acurite, etc.) Test method must be a current DEP-approved training course. • Administrative Training • Application

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Certification Renewal

Requirements for Tank Handlers

For Categories:	3 Requirements:
TL	• Coating Manufacturer's Certification (letter from coating manufacturer stating you have been trained in the proper installation of their coatings) • Administrative Training • Application

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Certification Renewal

Requirements for Tank Inspectors

For Categories:	3 Requirements:
IAF/IAM	• Maintain API 653 Certification • AST Technical Seminar • Application
IAM only	• Maintain API 653 or STI SP001 Certification • AST Technical Seminar • Application

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Certification Renewal

Requirements for Tank Inspectors

For Categories:	2 Requirements:
IUM	• UST Technical Seminar • Application

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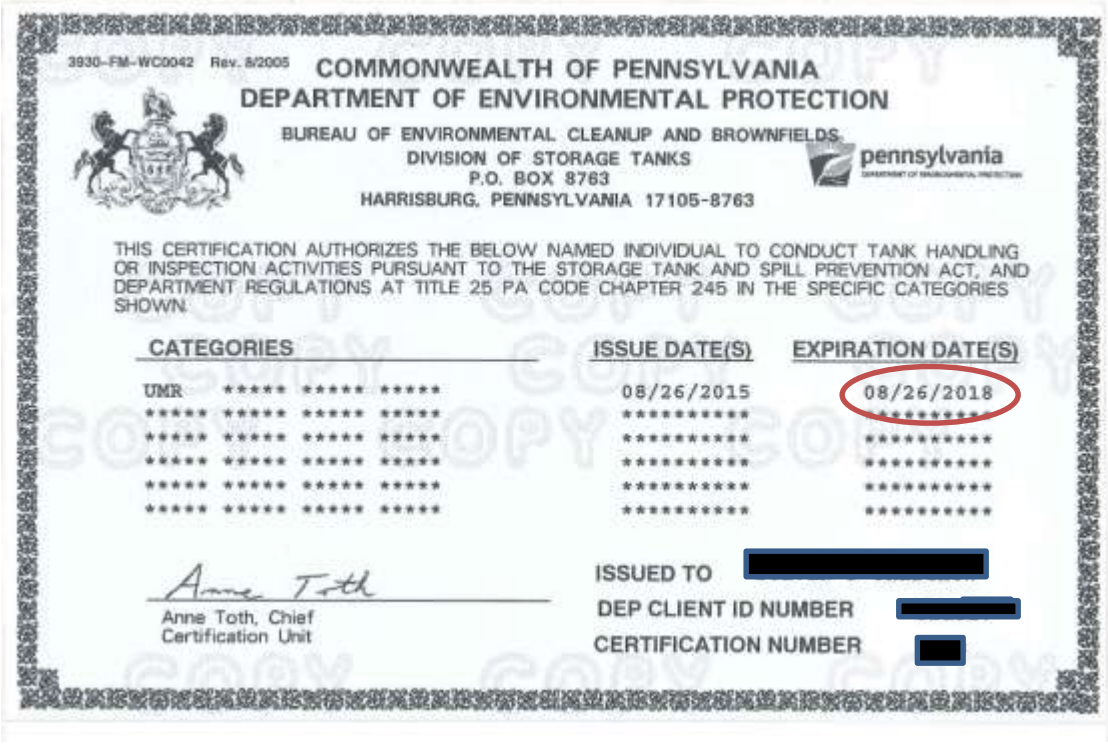
Certification Renewal

Pay Attention to Your Expiration Date!



3930-FM-WC0042 Rev. 8/2005

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF ENVIRONMENTAL CLEANUP AND BROWNFIELDS
DIVISION OF STORAGE TANKS
P.O. BOX 8763
HARRISBURG, PENNSYLVANIA 17105-8763

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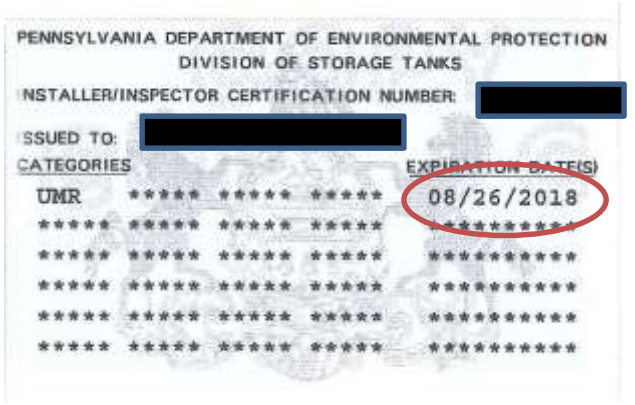
THIS CERTIFICATION AUTHORIZES THE BELOW NAMED INDIVIDUAL TO CONDUCT TANK HANDLING OR INSPECTION ACTIVITIES PURSUANT TO THE STORAGE TANK AND SPILL PREVENTION ACT, AND DEPARTMENT REGULATIONS AT TITLE 25 PA CODE CHAPTER 245 IN THE SPECIFIC CATEGORIES SHOWN.

CATEGORIES	ISSUE DATE(S)	EXPIRATION DATE(S)
UMR ***** ***** *****	08/26/2015	08/26/2018
***** ***** ***** *****	**********	**********
***** ***** ***** *****	**********	**********
***** ***** ***** *****	**********	**********
***** ***** ***** *****	**********	**********
***** ***** ***** *****	**********	**********

Anne Toth

Anne Toth, Chief
Certification Unit

ISSUED TO [redacted]
DEP CLIENT ID NUMBER [redacted]
CERTIFICATION NUMBER [redacted]



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF STORAGE TANKS

INSTALLER/INSPECTOR CERTIFICATION NUMBER: [redacted]

ISSUED TO: [redacted]

CATEGORIES	EXPIRATION DATE(S)
UMR ***** ***** *****	08/26/2018
***** ***** ***** *****	**********
***** ***** ***** *****	**********
***** ***** ***** *****	**********
***** ***** ***** *****	**********
***** ***** ***** *****	**********

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Expired over 60 days!

An individual's failure to renew certification within the *60 day period immediately following* an expiration date requires applicant to meet the *initial certification requirements* for that category. §245.114 (g)(1)

Renewal requests submitted more than 60 days beyond the expiration date require:

- **Application**
- **Attachment A – listing verifiable activities**
- **Pass Category-specific Examination Module**
- **Note – Technical Training requirement specified at §245.111(a) is met by individuals who previously held certification in the category**

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Renewal Notification Letters

- **Individuals and companies are notified by mail 4-5 months prior to expiration of each certification.**
  - ✓ **This is a courtesy only**
  - ✓ **Requires the department to maintain accurate certification records**
  - ✓ **DEP notification of changes to Addresses, phone numbers, employer/employee relationships are extremely important**
  - **Failure to notify the Department of changes in certification information is a violation of the regulations.**

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Lost Card?

Call or E-mail for a Replacement

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Modifying Your Certification

Adding one or more certification categories.

In most cases, you will need to meet the "initial" certification requirements:

- **Years of experience**
- **Technical Training (initial course)**
- **Activities**
- **Application**
- **Technical Exam**

Refer to "initial" qualifications sheet.

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Modifying Your Certification

Some exceptions:

- **You currently hold UMR:**
  - **If you have a passing UMR exam score within the past 2 years, you can add AMR by submitting an application and requesting AMR. No training, no activities, no exam needed.**
  - **If no recent score, a new exam will be required. Submit application and take either the UMR or AMR exam.**
- **You currently hold AFMX or UMX. You can add AMMX by submitting an application and taking the AMMX exam. No technical training or activities needed.**
- **You currently hold AMMX. You can add AMNX by submitting an application, 6 AST installation activities, and taking the AMNX exam. No technical training needed.**

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Modifying Your Certification

Adding Inspector Categories:

- **IAF/IAM:**
  - 4 years experience
  - API 653 Certification
  - Attachment A with 12 activities
  - Application
  - Exam
- **IAM only:**
  - 4 years experience
  - API 653 or STI SP001 Inspector Certification
  - Application
  - Exam
- **IUM:**
  - 4 years experience
  - UMX Certification
  - UTT Certification or Familiarization
  - Corrosion Protection Training
  - Application
  - Exam

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Initial Certification

For first-time applicants:

- **Required years of experience.**
- **Initial technical training course for each requested category, out of state certification, other industry training**
- **Application**
- **Attachment A for each requested category showing required number of activities**
- **Exams:**
  - **Administrative exam**
  - **Technical exam for each certification category**

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Technical Training Courses

Training Courses for Tank Handlers and UTT

- **Current list is located on the website.**
- **If you are adding a new category or signing up a co-worker who is brand new to certification, make sure you choose a course with the I/R designation (initial or renewal course)**
- **Developing your own training course:**
  - **Application is available on the website**
  - **Technical training for initial category-specific certification must be based on Nationally-recognized codes and standards in conjunction with manufacturers specifications**
  - **Technical training for renewal of category-specific certification must at a minimum review the technical and regulatory material appropriate for the certification category**

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Certification Examinations

§ 245.105 – Certification Examinations

- **Separate administrative and technical content for examinations**
- **Passing score 80 for administrative and each technical section**
- **Applicants have up to 1 year from the date of authorization to take the examination**
- **An applicant failing an examination is eligible to retake the examination for up to 1 year from the failed examination test date, but no later than 18 months from date of authorization.**

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Certification Examinations

The Certification Exam Process

- **Application reviewed (Experience, Education, Training, Attachments)**
- **Authorization letter and study materials sent to applicant at address designated on application (Home or Employer)**
- **DEP provides Plut Examination Service (PES) with names, addresses, list of authorized categories, & eligibility dates.**
- **PES notifies applicant of test dates and locations; provides registration forms & instructions. Exam fee $75 per module.**

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Certification Examinations

The Certification Exam Process, continued…

- **Two weeks before the exam, PES provides DEP with a list of individuals who registered for the exam.**
- **The Certification Unit cross references the list with applicant names & authorizations; verifies accuracy; notifies PES it is ok to proceed.**
- **Plut Examination Service prints the examination forms.**
  - **Signing up for the exam at this point will require an additional fee.**
  - **PES refund and credit policy is in effect, and is clearly defined in the registration materials mailed by PES to all individuals authorized by DEP to sit for the exams.**

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Certification Application

§ 245.104 – Application for Installer or Inspector Certification

- ✓ A complete application shall be submitted no later than 60 days prior to the announced date of the certification examination
- ✓ Use current forms as provided by the Department
- ✓ Include all Attachment A's, training certificates, etc.
- ✓ Signed and dated by applicant and company official (no computer generated signatures)

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Certification Application

STORAGE TANK INSTALLER AND INSPECTOR CERTIFICATION APPLICATION

(Read the instructions before completing this application)

OFFICIAL USE ONLY	
DATE	**Application #** _____
Appl. Appr. **Appl. Denied**	**Client ID #** _____
	Employer ID # _____
_____ _____	**Master Auth. #** _____
_____ _____	**Auth. ID#** _____
	Date Rec'd _____

SECTION I – APPLICANT INFORMATION

Name _____ SSN _____
Last First MI

Home Address _____

City _____ State _____ Zip +4 _____

Municipality _____ County _____
(City, Boro, Twp)

Home Telephone (_____) _____ Cell Phone (_____) _____

Email Address _____

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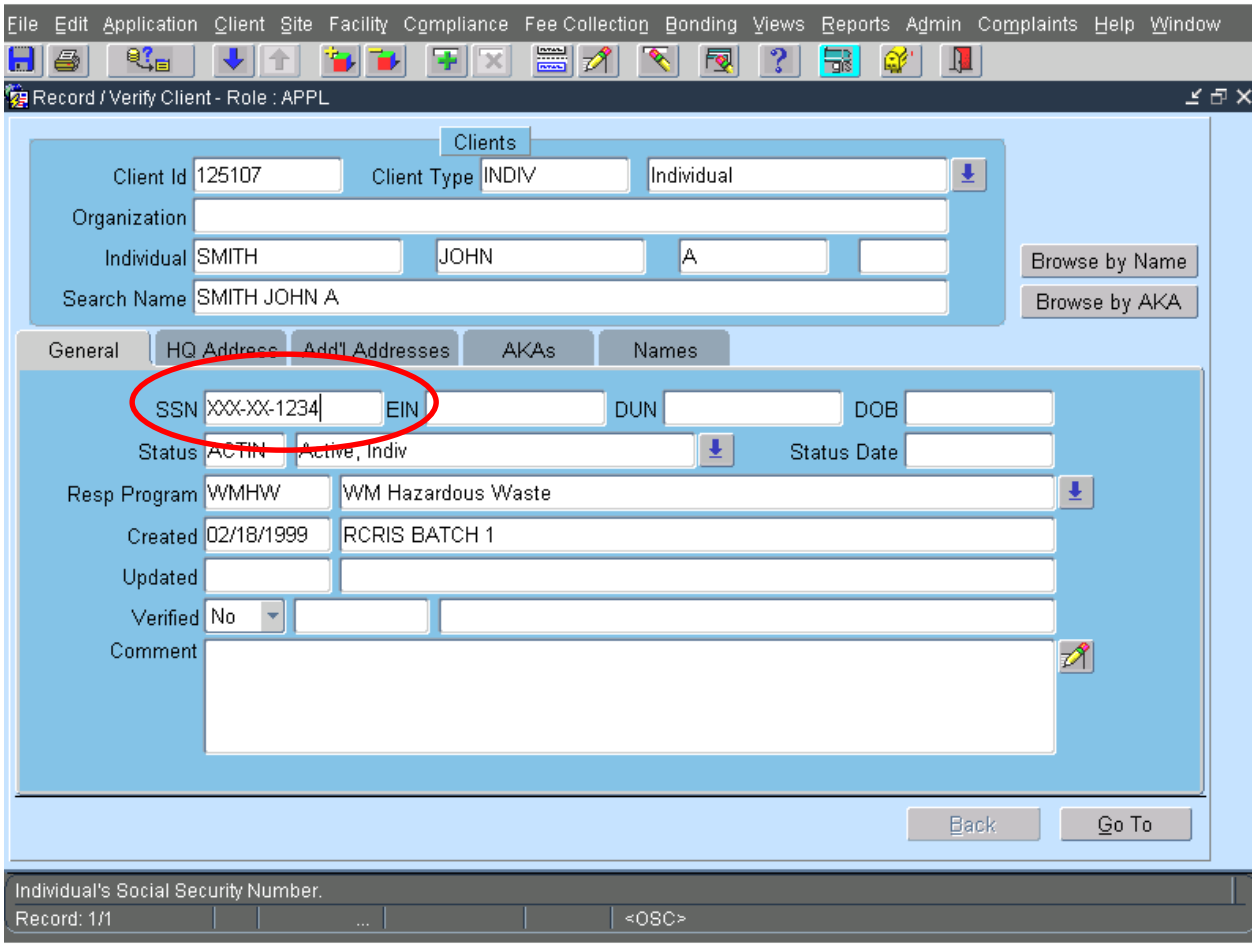
Certification Application



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Certification Application

2630-PM-BECB0506 4/2012

SECTION III – CURRENT EMPLOYER INFORMATION (If more than one, attach additional pages)

Hire Date _____ Employer's Federal Tax ID # (EIN) _____

Employer's DEP Client ID # _____ Employer's Certification # _____

Name _____ Company Type Code _____

Street Address _____

City _____ State _____ Zip +4 _____

Municipality _____ County _____
(City, Boro, Twp)

Telephone (_____) _____-_____ Fax (_____) _____-_____

Company Contact Person _____

Email Address _____

SECTION IV – MAIL CORRESPONDENCE TO ADDRESS

☐ Applicant Address ☐ Employer's Address

If the applicant has more than one employer and chooses to have correspondence delivered to the employer's address, provide the name of that employer. _____

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Certification Application

	Initial	Renewal		Delete
		Retest	Training	
INSTALLER CATEGORIES				
Underground				
UMX	☐	☐	☐	☐
UMR	☐	☐	☐	☐
UTT	☐		☐	☐
Aboveground				
AMMX	☐	☐	☐	☐
AMNX	☐	☐	☐	☐
AMR	☐	☐	☐	☐
AFMX	☐	☐	☐	☐
AFR	☐	☐	☐	☐
AMEX	☐	☐	☐	☐
ACVL	☐	☐	☐	☐
Underground/Aboveground				
TL	☐		☐	☐
INSPECTOR CATEGORIES				
Underground				
IUM	☐		☐	☐
Aboveground				
IAM	☐		☐	☐
IAF	☐		☐	☐

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Certification Application

Aboveground			
IAM_____	___☐___	_____ ____☐___	____☐___
IAF_____	___☐___	_____ ____☐___	____☐___

SECTION VI – APPLICANT'S CERTIFYING STATEMENT

I certify under penalty of law as provided in 18 PA C.S.A. §4904 (relating to unsworn falsification to authorities), that I am the applicant herein named, that I have received the safety training as provided for under §245.111(h) of the regulations, and that the information I have provided on this Application for Certification is true, accurate, and complete to the best of my knowledge and belief.

_____ _____/_____/_____

Signature of the Applicant (In Ink) Date

SECTION VII – EMPLOYER'S CERTIFYING STATEMENT

I certify under penalty of law as provided in 18 PA C.S.A. §4904 (relating to unsworn falsification to authorities), that I am an officer of the applicant's employer. The applicant herein named has been provided with adequate safety training as provided for under §245.111(h) of the regulations. I further certify that the information provided on this Application for Certification is true, accurate, and complete to the best of my knowledge and belief.

_____ _____/_____/_____

Signature & Title of Company Officer (In Ink) Date

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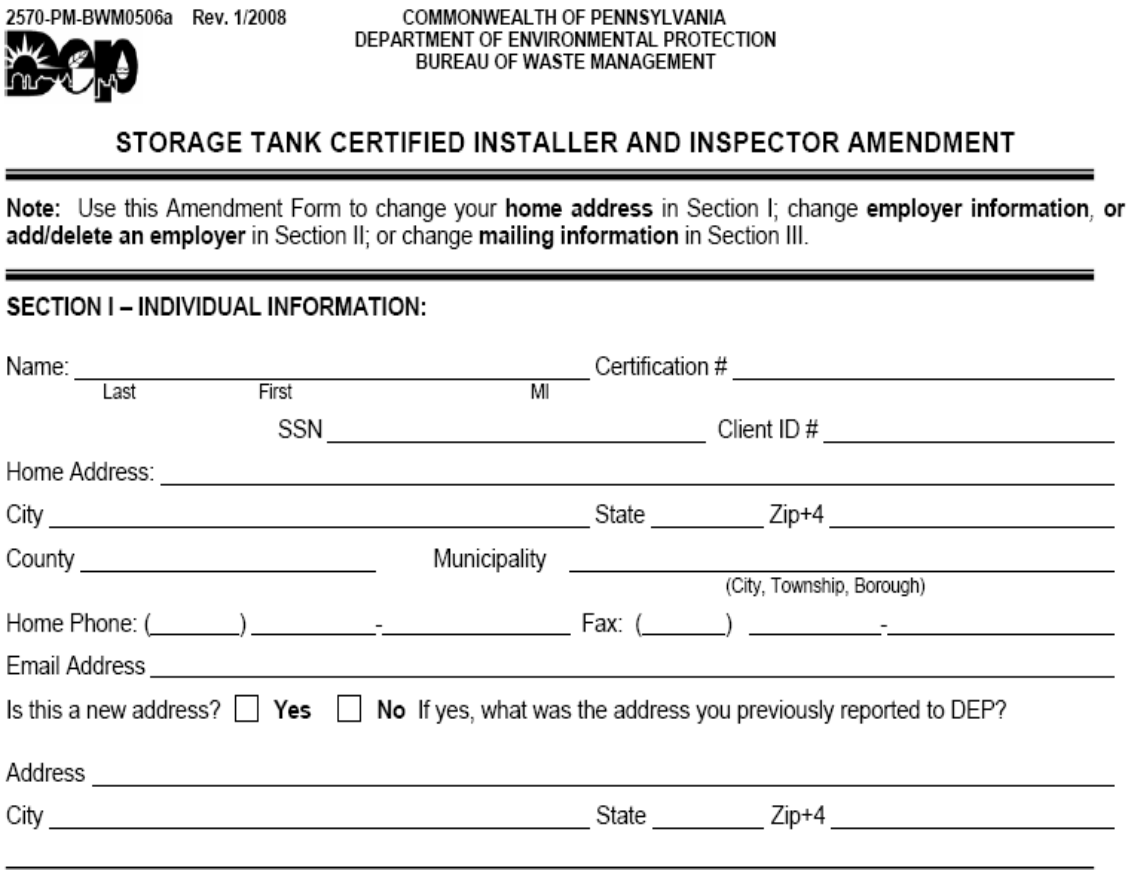
Certification Amendment

Certification Amendment Form

Very Important!



2570-PM-BWM0506a Rev. 1/2008

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

STORAGE TANK CERTIFIED INSTALLER AND INSPECTOR AMENDMENT

Note: Use this Amendment Form to change your **home address** in Section I; change **employer information**, **or add/delete an employer** in Section II; or change **mailing information** in Section III.

SECTION I – INDIVIDUAL INFORMATION:

Name: _____ Certification # _____
Last First MI

SSN _____ Client ID # _____

Home Address: _____

City _____ State _____ Zip+4 _____

County _____ Municipality _____
(City, Township, Borough)

Home Phone: (_____) _____-_____ Fax: (_____) _____-_____

Email Address _____

Is this a new address? ☐ **Yes** ☐ **No** If yes, what was the address you previously reported to DEP?

Address _____

City _____ State _____ Zip+4 _____

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Certification Amendment

Certification Amendment Form

Change or add employer?

SECTION II – CURRENT EMPLOYER INFORMATION:

Federal Employer Tax Number (EIN)_____

Employment Start Date _____ Company Certification Number: _____

Employer Client ID _____ Company Type Code _____

Employer Name _____

Address _____

City _____ State _____ Zip+4 _____

County _____ Municipality _____
(City, Township, Borough)

Company Contact _____

Phone: (_____) _____-_____ Ext _____ Fax: (_____) _____-_____

Email

Are you ☐ Adding an Employer? ☐ Changing Employers? ☐ Deleting an Employer?

Previous Employer's Name _____ Date of change _____

SECTION III – MAILING INFORMATION:

Send correspondence to (Choose One) ☐ **Applicant's Home Address** ☐ **Employer's Address**

If more than one employer, specify employer _____

Signature _____ Date _____

- 1 -

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Company Certification

§ 245.121 – Certification of Companies

- **The company applying for certification must employ at least one (1) DEP certified tank handler or inspector.**
  - **Note: An employee is an individual who has completed a IRS Form W-4 and to whom a company issues a IRS Form W-2 (Wage and Earnings Statement) at the end of the year.**
    - **A company may contract with a certified individual to whom the company will issue an IRS Form 1099.**
    - **The non-certified company may contract with a certified company for the performance of tank handling, tightness testing or inspection activities.**
    - **The certified individual and certified company is responsible for submitting all forms or reports, and provides DEP with all applicable certification ID numbers.**

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Company Certification

2630-PM-BECB0510 4/2012
Application

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF ENVIRONMENTAL CLEANUP AND BROWNFIELDS

STORAGE TANK COMPANY CERTIFICATION APPLICATION

OFFICIAL DEP USE ONLY			
Appl. Appr	Appl. Den.	Application # _____	Client ID # _____
_____	_____	Master Auth. # _____	Auth. ID# _____
_____	_____		

SECTION I – APPLICATION TYPE

☐ **FIRST** request for Company Certification (This company has never applied for certification)
☐ **RENEW** Company Certification (This company is currently certified, or has been previously certified)
☐ **AMEND** Company Certification Information (Change of address, ownership, certified employees, etc.)

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Company Certification

2570-PM-BWM0510 Rev. 12/2009

Federal Employer Tax ID # (EIN) _____

SECTION VII – CERTIFIED EMPLOYEES

Please list all certified installers and/or inspectors employed by this company. Also, if applicable list the names and termination dates of any previously employed and certified individuals who have terminated. If you have no PA Certified Installers or Inspectors write "None". If you have an employee who has applied for their first certification write "Pending". Note that an "employee" has a IRS Form W-4 (Tax withholding) on file and receives a Form W-2 (Wage and Earnings Statement) from the company. At least one certified individual must be employed in order for the company to receive DEP certification.

**If more space is needed copy this page before listing the certified individuals.*

		A=Active	P=Pending	T=Terminated
Installer/Inspector Name	Certification Number	Status (A, P, T)	Hire Date	Termination Date
Brown, John L.	0101	A	07/22/05	
Smith, Edward P.	0202	T		03/21/09
Jones, Roger B.	NA	P	02/19/08	

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Certified Companies List

Storage Tanks Website →
Underground Storage Tanks →
Storage Tank Certified Companies Search

***Updated Daily**

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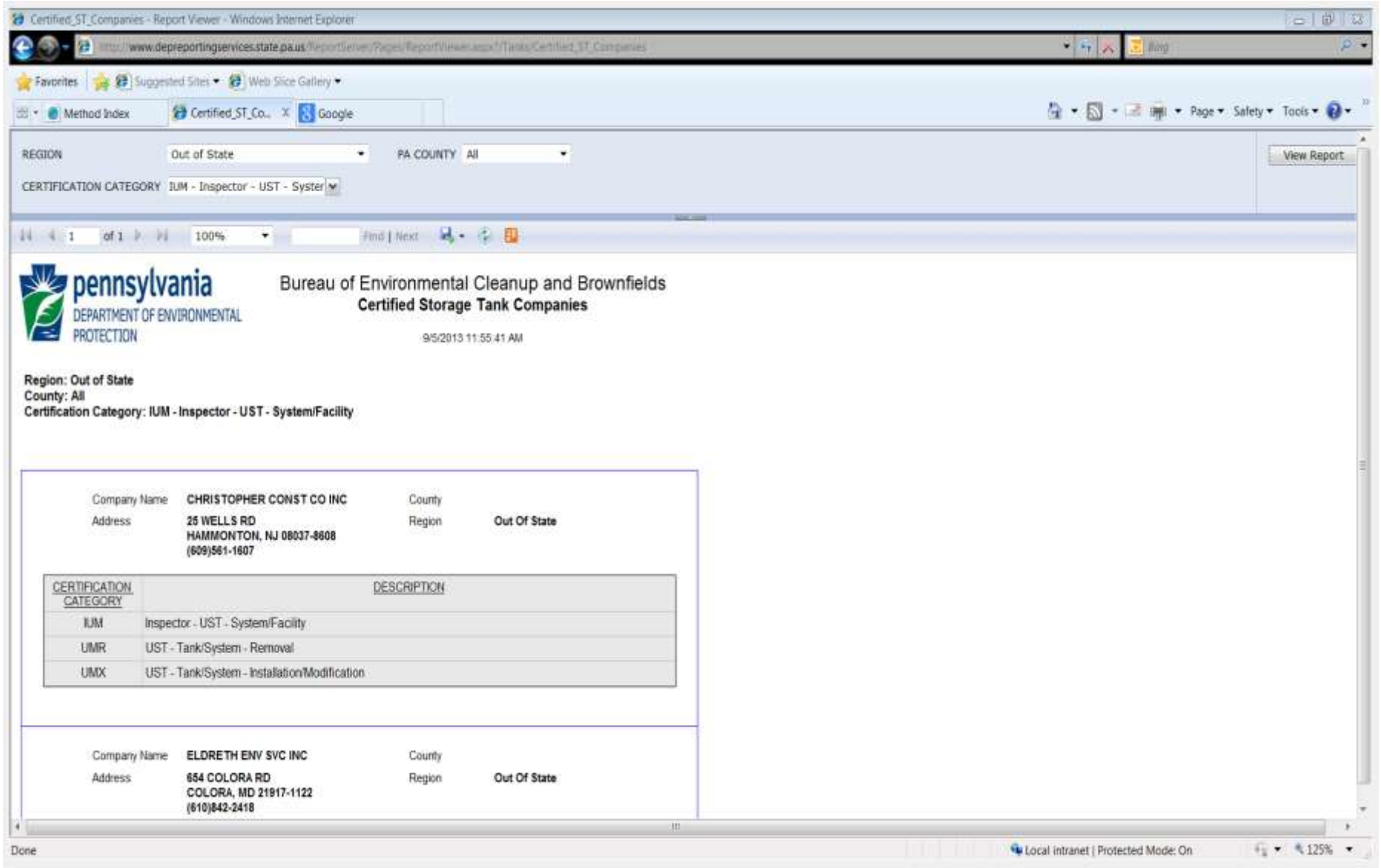
Certified Companies List



Standards of Performance

Standards of Performance

- **things that are required of you as a certified individual or company**

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Standards of Performance

- **§ 245.132 – Standards of Performance**

  (a) Certified companies, certified installers and certified inspectors shall…

  (1) Maintain current technical and administrative specifications and manuals…

  (2) Submit, within 60 days of the inspection activity or 30 days of the tank handling activity, a Department-approved form certifying that the activity… meets the requirements of the act and this chapter…

  … (for projects requiring multiple certification activities and individuals the tank handling and inspection reports may be submitted within 30 days of the conclusion of all activities).

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Standards of Performance

(3) Maintain complete records…for a minimum of 10 years.

(4) Report a release…or suspected contamination…observed while performing certified activities. Submit a written report within 48 hours. If notification is being submitted as a result of a failed tightness test, a copy of the test should accompany the written notification to the Region.

(5) Installers or inspectors should not sign documentation unless personally performed or supervised.

(6) Not certify… that the storage tank system project or component thereof is complete unless it complies with the act or this chapter. Project certification applies to both certified activities and non-tank handling activities performed as part of the project.

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Standards of Performance

§ 245.132(b) A certified installer or certified inspector shall display a certification identification card or certificate upon request.

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Standards of Performance

- **§ 245.21(a) – Tank Handling and Inspection Requirements**

  The certified individual must perform the activity or provide "direct, onsite supervision" whenever tank handling and inspection activities are occurring.

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Standards of Performance

Pennsylvania Department of Environmental Protection
Division of Storage Tanks
March 28, 2014

IMPORTANT NOTICE
Signatures

The Department has recently investigated numerous occurrences in which signatures affixed to Department documents were not signed by the individuals themselves. These documents include, but are not limited to, the Registration/Permitting Application Form, UST and AST modification report forms, tank inspection report forms, and Installer/Inspector and Company Certification Applications. Documentation submitted to the Department must be reviewed and signed by the proper individual(s), acknowledging the legal statements preceding the signature field(s) in the document.

Under no circumstances should any other person sign the name of a certified individual, tank owner, or company officer.

The Department takes this issue seriously. The submittal of fraudulent signatures to the Department can result in enforcement, such as suspension or revocation of Installer/Inspector or Company Certification. Criminal penalties can be considered under the guidelines set forth in 1 Pa. C.S. §4904, relating to unsworn falsification to authorities.

If you have questions or desire clarification of the above, please contact Eric Lingle with the Division of Storage Tanks at (717) 772-5599.

Standards of Performance

UTT must provide written test results to the owner within 20 days of performing the test

The UTT performing the test must record individual and company certification numbers on the test results report given to the owner

- ***If a tightness test fails CALL the DEP regional office serving the County where the facility is located.***
- ***Mail the Notice of Contamination or Suspected Release to the regional office within 48 hours of performing the test AND attach a copy of the tightness test report.***

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Standards of Performance

Tank Installers Indemnification Program (TIIP):

- ***Companies doing underground tank work, make sure you keep up with fee payments.***
- ***Annual company fee***
- ***Activity Fees***
- ***Company certification will not be renewed if behind on payments.***

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Storage Tank Permitting

Permitting Requirements

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Storage Tank Permitting

§ 245.222 – Application Requirements

- **Application for a General Operating Permit shall be submitted on a Department form…**
  - **Storage Tank Registration / Permitting Application Form**
  - **A one-page Storage Tank Registration Amendment Form is now available for use in making some changes.**

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Storage Tank Permitting

2630-FM-BECB0607 Rev. 8/2012
Form

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF ENVIRONMENTAL CLEANUP AND BROWNFIELDS

STORAGE TANK REGISTRATION AMENDMENT FORM

Before completing this form, read the instructions provided for this form.

I. FACILITY AND CLIENT INFORMATION	
Facility ID#	**Facility Name**
County	**Municipality**
Client's Name or Registered Fictitious Name	**Client ID#**

II. PURPOSE OF SUBMITTAL

- ☐ Change to **C status**, Currently In Use Tank(s) *
  * *For Underground Storage Tanks (UST), attach the UST Operator Training Documentation Form (2630-PM-BECB0514a) and copies of the Class A and Class B operator training certificates.*
- ☐ Change to **T status**, Temporarily Out of Use Tank(s)
- ☐ Change to **E status**, Tank(s) registered in error **only**
- ☐ Change Capacity
- ☐ Change Substance
- ☐ Change Contact Information

III. TANK INFORMATION

Tank #	Change Date (Mo/Day/Yr)	Status	Capacity (Gallons)	Substance Name	CAS# Component %

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Storage Tank Permitting

2630-PM-BECB0514 Rev. 9/2013
Form

X. INSTALLER / REMOVER CERTIFICATION

This section must be completed by the certified tank handler(s) who is responsible for the installation or removal from service of the aboveground and underground storage tank systems listed in Section VI. Tank modification activity must be submitted on a "Tank Modification Report" form.

SIGNATURE & CERTIFICATION OF INSTALLER(S) / REMOVER(S)

As the certified tank handler responsible for the tank handling activities in the category or categories listed, I certify that all tank handling activities were conducted in compliance with the design, installation and operation standards of the Storage Tank and Spill Prevention Act of 1989 and all applicable regulations. I also certify, under penalty of law as provided in 18 PA C.S.A. 4904 (relating to unsworn falsification to authorities), that the information provided therein is true, accurate and complete to the best of my knowledge and belief.

Tank#	Installer/Remover Name	Construction Standard	Individual Certification#	Certification Category	Company Certification#	Installer/Remover Signature	Date

XI. INSPECTOR CERTIFICATION

This section must be completed by the DEP Certified Tank Inspector(s) who is responsible for verifying the installation standards for field constructed tanks and aboveground tanks greater than 21,000 gallons listed in Section VI. (Type or Print legibly) A DEP Certified Inspector may also be responsible for inspecting existing ASTs which are entering regulated service for the first time with no tank handling activities.

SIGNATURE & CERTIFICATION OF INSPECTOR(S)

As the certified tank inspector responsible for verifying tank handling activities and construction standards, I certify that the tank(s) listed below are constructed to appropriate industry standards and, if applicable, to manufacturer's specifications; that the tank(s) have been tested as required by industry standards; and that the tank(s) meet or exceed applicable design and operating standards; and are in compliance with the requirements of the Storage Tank and Spill Prevention Act of 1989, and all applicable regulations. I also certify under penalty of law as provided in 18 PA C.S.A. 4904 (relating to unsworn falsification to authorities), that the information provided herein is true, accurate and complete to the best of my knowledge and belief.

Tank#	Inspector Name	Construction Standard	Individual Certification#	Certification Category	Company Certification#	Inspector Signature	Date

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Storage Tank Permitting

ONLINE STORAGE TANK REGISTRATION FEE PAYMENT NOW AVAILABLE

Visit www.dep.pa.gov, Search: "Storage Tanks ePermitting"

Click the link for ePermitting to go to the Storage Tanks ePermitting web page.

Follow the instructions on the ePermitting page to:

- Create a Greenport account
- Submit an Electronic Filing Administrator Agreement
- Gain access to your storage tank facility invoices
- Make payment
- Print a temporary registration certificate

A video tutorial is available to assist you through the payment process.

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New Registration Certificate

- More inspection information
- Easily track inspection due dates
- Shows overdue inspections
- “TBD” indicates the next inspection due date will be determined once tank repairs are made (AST only)

VERIFY PRESENCE OF WATERMARKED HOLD TO LIGHT TO VIEW

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Environmental Cleanup and Brownfields

STORAGE TANK REGISTRATION/PERMIT CERTIFICATE
EXPIRATION: JUN-04-2015

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
003	7,000	DIESL	PBR	Approved	**********	**********	07/10/2016	**********
004	3,000	GAS	PBR	Approved	**********	**********	07/10/2016	**********
005	3,000	DIESL	PBR	Approved	**********	**********	07/10/2016	**********
****	*****	****	*****	***	*** *****	**********	**********	**********	**********
****	*****	****	*****	***	*** *****	**********	**********	**********	**********
****	*****	****	*****	***	*** *****	**********	**********	**********	**********
****	*****	****	*****	***	*** *****	**********	**********	**********	**********
****	*****	****	*****	***	*** *****	**********	**********	**********	**********
****	*****	****	*****	***	*** *****	**********	**********	**********	**********

Client ID: 164666
Owner: VERNON L GESSNER
Id: 22-61557
GESSNER LOGGING
496 LUXEMBURG RD
LYKENS PA 17048

Site ID: 572708
Facility Kind: TRANS
Facility Id: 22-61557
GESSNER LOGGING
LUXENBURG RD
RR 1 BOX 391
LYKENS PA 17048

WARNING:

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Storage Tank Permitting

§ 245.203 – General Requirement for Permits

(f) The Department will automatically withhold or withdraw the operating permit for a storage tank that is reported… in temporary closure or temporary removal from service (out-of-service) status…

(g) A storage tank system may not be operated if the Department suspends, revokes or denies the tank operating permit. A person may not deliver or place a regulated substance in a tank if the Department suspends, revokes or denies the tank operating permit

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Delivery Prohibition

- **Lists are available on Storage Tank Web Site**
  - **Active tank list – no large ASTs or highly hazardous tanks**
  - **Suspended or revoked as a result of enforcement action**
  - **Tanks without operating permits**

- **Tanks in "T" (temporarily out of service) status**
  - **Tank must be empty**
  - **Operating permit withdrawn or withheld**

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Storage Tank Listings

Storage Tanks Website → Registration → Regulated Tank List

Excel spreadsheets (updated monthly)

or live search

***Excludes large ASTs and highly hazardous tanks**

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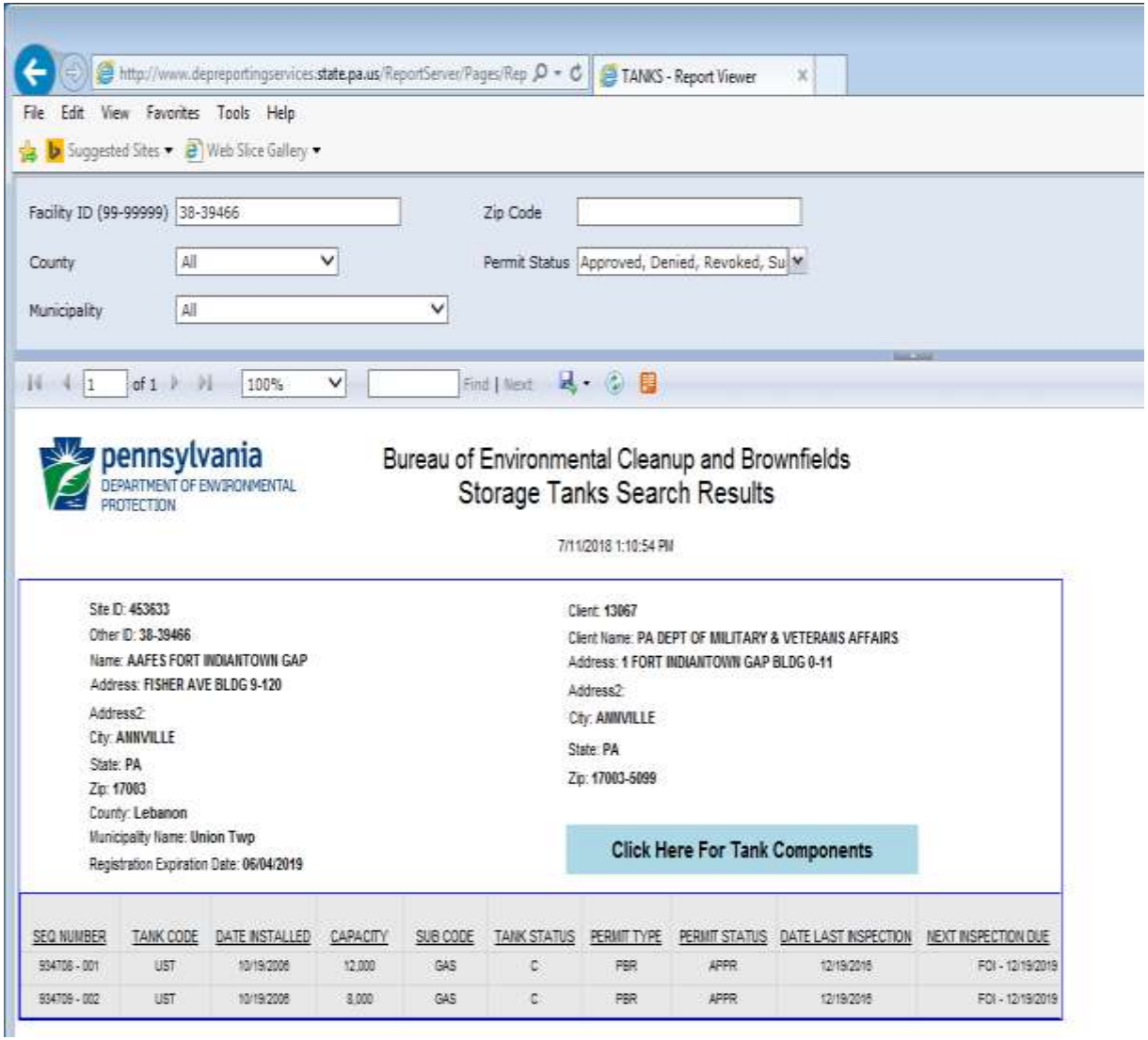
Storage Tank Listings



Query On:

- **Facility ID**
- **County**
- **Municipality**
- **Zip Code**
- **Permit Status**

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Storage Tank Listings

Bureau of Environmental Cleanup and Brownfields
Tank Components

7/10/2018 1:19:54 PM

EQ NUMBER	TANK CODE	TANK SYSTEM COMPONENT	TANK COMPONENT	DATE BEGIN
34708 - 001	UST	1 - TANK CONSTRUCTION	1F - FIBERGLASS (DOUBLE WALL)	10/19/2006
34708 - 001	UST	2 - UG PIPING CONSTRUCTION	2J - Double wall, rigid (FRP) primary	10/19/2006
34708 - 001	UST	4 - PUMP/DELIVERY SYSTEM	4C - PRESSURE	12/21/2010
34708 - 001	UST	5 - PIPE RELEASE DETECTION METHOD	5D - INTERSTITIAL MONITOR	01/13/2014
34708 - 001	UST	5 - PIPE RELEASE DETECTION METHOD	5K - ELECTRONIC LINE LEAK DETECTOR	12/21/2010
34708 - 001	UST	6 - SPILL PREVENTION	6Y - YES	10/19/2006
34708 - 001	UST	7 - OVERFILL PREVENTION	7A - OVERFILL ALARM	10/19/2006
34708 - 001	UST	12 - TANK RELEASE DETECTION METHOD	12E - AUTOMATIC TANK GAUGING	04/26/2016
34708 - 001	UST	18 - UST TOTAL SECONDARILY CONTAINED	18Y - YES	10/19/2006
34708 - 001	UST	19 - STAGE I VAPOR RECOVERY	19B - 2 POINT	10/19/2006
34708 - 001	UST	20 - STAGE II VAPOR RECOVERY	20B - COMPLETE ASSIST SYSTEM	01/13/2014
34708 - 001	UST	21 - TANK-TOP CONTAINMENT SUMPS	21A - AT ALL PENETRATIONS	12/21/2010
34708 - 001	UST	22 - UNDER-DISPENSER CONTAINMENT	22A - AT ALL DISPENSERS	12/21/2010
34708 - 001	UST	23 - LINE LEAK DETECTOR SHUTS OFF PUMP	23Y - YES	12/21/2010
34708 - 001	UST	PFLX - Piping Flexible Connectors	PFLXD - Completely Inside Containment Sump, Secondary Pipe or Liner	11/20/2007
34709 - 002	UST	1 - TANK CONSTRUCTION	1F - FIBERGLASS (DOUBLE WALL)	11/20/2007
34709 - 002	UST	2 - UG PIPING CONSTRUCTION	2J - Double wall, rigid (FRP) primary	11/20/2007
34709 - 002	UST	4 - PUMP/DELIVERY SYSTEM	4C - PRESSURE	11/20/2007
34709 - 002	UST	5 - PIPE RELEASE DETECTION METHOD	5D - INTERSTITIAL MONITOR	01/13/2014
34709 - 002	UST	5 - PIPE RELEASE DETECTION METHOD	5K - ELECTRONIC LINE LEAK DETECTOR	12/21/2010
34709 - 002	UST	6 - SPILL PREVENTION	6Y - YES	11/20/2007
34709 - 002	UST	7 - OVERFILL PREVENTION	7A - OVERFILL ALARM	11/20/2007
34709 - 002	UST	12 - TANK RELEASE DETECTION METHOD	12E - AUTOMATIC TANK GAUGING	04/26/2016
34709 - 002	UST	18 - UST TOTAL SECONDARILY CONTAINED	18Y - YES	11/20/2007
34709 - 002	UST	19 - STAGE I VAPOR RECOVERY	19B - 2 POINT	11/20/2007
34709 - 002	UST	20 - STAGE II VAPOR RECOVERY	20B - COMPLETE ASSIST SYSTEM	01/13/2014

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Site Specific Installation Permits

§ 245.231 – Scope

Site-specific installation permits are required *prior to* construction, reconstruction or installation…

- **When adding an aboveground tank with a capacity greater than 21,000 gallons at an existing facility**
- **When installing tanks with an aggregate capacity greater than 21,000 gallons at a new AST facility**
- **New highly-hazardous storage tank systems**
  - **An AST or UST with a capacity greater than 1,100 gallons storing a highly hazardous substance**
- **New underground field constructed storage tank systems**

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Site Specific Installation Permits

New Large Aboveground Facility:

An aboveground storage tank or a group of aboveground storage tanks with a capacity greater than 21,000 gallons at a site where no previously regulated ASTs were registered.

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Site Specific Installation Permits

Major Elements:

- **Part I / Part II SSIP Application**
- **General Information Form**
- **Municipal & County Notification Letters (and Proof of Receipt)**
- **Siting – Floodplain, Wetlands**
- **Geology – if karst, deep-mined, or other geological issues, requires geotechnical analysis**
- **Mapping – plot plan, topographic map, wells within 2500’ plotted**
- **Environmental Assessment – when required**
- **30-day public notice in PA Bulletin required for new facilities (DEP handles this)**

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Other Storage Tank Issues

Additional Issues and Information

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New Alternative Fuels Factsheet

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UNDERGROUND STORAGE TANK (UST) EQUIPMENT COMPATIBILITY & STORAGE OF BIOFUELS AND BIOFUEL BLENDS

Federal and Pennsylvania release prevention laws require that regulated underground storage tank (UST) systems be constructed or lined with material that is compatible with the substance stored. Compatibility, in this sense, refers to the ability of both the storage tank system components and the stored substance to maintain their respective physical and chemical properties upon contact with one another for the design life of the tank system.

Because the physical and chemical properties inherent to biofuels, such as ethanol and biodiesel, differ from their conventional petroleum fuel counterparts, some UST equipment and components that are compatible with conventional petroleum fuels are not compatible with biofuels or biofuel blends. Higher biofuel blends – such as gasoline-ethanol blends containing greater than 10 percent ethanol, and biodiesel-blended fuel containing greater than five percent biodiesel – can degrade many non-metallic materials, such as natural rubber, polyurethane, older adhesives, certain elastomers and polymers used in flex piping, bushings, gaskets, meters and filters. They can also degrade soft metals, such as zinc, brass, aluminum, lead and copper.

Whether a newly installed UST system or an existing UST system that has been converted to store a different substance, the components of the UST system must satisfy the compatibility requirement before receiving delivery of product into the UST. The following UST system components should be compatible with the substance stored:

- Tank or internal tank lining
- Spill buckets and containment sumps
- Overfill prevention equipment
- Drop tube
- Fill and riser caps
- Line leak detector
- Release detection floats, sensors and probes
- Piping and flexible connectors
- Sealants (including pipe dope and thread sealant)
- Fittings, gaskets, o-rings, bushings, couplings and boots
- Suction pump and components
- Submersible turbine pump and components
- Product shear valve
- Dispensers and hanging hardware

Owners and operators of USTs storing ethanol blends may use the following code to comply with the compatibility requirement:

- American Petroleum Institute Publication 1626 (API RP 1626), "Storing and Handling Ethanol and Gasoline-Ethanol blends at Distribution Terminals and Service Stations."

There are a number of resources available to assist UST owners and operators with determining equipment compatibility with biofuels and biofuel blends, including:

- The Environmental Protection Agency's Office of Underground Storage Tanks maintains information about biofuels and links to resources relevant to storing ethanol and biodiesel in USTs: www.epa.gov/oust/altfuels/biofuels.htm.
- The Petroleum Equipment Institute maintains an online database that contains information on equipment compatibility with ethanol-blended and biodiesel-blended fuels. Listings include product specifications and links to manufacturers: http://resource.pei.org/altfuels/guide.asp.
- The Steel Tank Institute maintains information about biofuels storage and links to tank manufacturers' statements of compatibility: www.steeltank.com.

In addition to the material compatibility of UST equipment with the substance stored, the functional capability of equipment used to meet the UST system operating requirements – such as overfill prevention and release detection equipment – may be dependent on the substance stored; as documented by equipment manufacturers' product literature and performance claims, or by third-party evaluations.

The Department of Environmental Protection (DEP) recommends that UST owners and operators follow the below checklist when installing a new UST system, or converting an existing UST system, for storage of gasoline-ethanol blends containing greater than 10 percent ethanol, or biodiesel-blended fuel containing greater than five percent biodiesel.

FACT SHEET

New Alternative Fuels Factsheet

Before Biofuel is Transferred to the Tank

- ☐ Determine storage tank system equipment compatibility with the product to be stored. Complete DEP form 2630-FM-BECB0608, *Alternative Fuel Storage Tank Installation/Conversion Form.*
- ☐ Check for water in the tank. No level of water is acceptable for gasoline-ethanol blends due to the possibility of phase separation.
- ☐ All visible fittings and connections at the top of the tank are tight (no vapors escape and no water enters).
- ☐ The appropriate vent top (pressure vacuum/updraft) is present for the type of product being stored.
- ☐ Stage I Vapor Recovery is installed and operational, if required.
- ☐ Sump and spill containment covers prevent water from entering.
- ☐ Water infiltration problems fixed if necessary.
- ☐ The tank has been cleaned of all water and sediment.
- ☐ Fill Labeling: Identify the fill port and paint access covers according to API RP 1637.
- ☐ Dispenser Labeling: label dispenser in compliance with Federal and State regulations.
- ☐ **New UST installation:** Within 30 days after installation, and prior to product delivery, submit to DEP a completed permit application 2630-PM-BECB0514, *Storage Tank Registration/Permit Application Form*, to register the UST and apply for an operating permit. Include the completed *Alternative Fuel Storage Tank Installation/Conversion Form.*

First Delivery

- ☐ Tank filled to 80 percent capacity as recommended by the Renewable Fuels Association (RFA) and kept as full as possible for seven to 10 days.
- ☐ Have dispenser calibrated prior to any retail sales.
- ☐ Conduct a precision test of the tank system (0.1 gph leak rate) with automatic tank gauge (ATG) system within seven days after tank is filled to make sure the UST system is tight and the leak detection equipment is operating properly. Investigate any "Fail" results according to the suspected release investigation requirements.
- ☐ Test for water (use alcohol compatible paste if gauging a UST storing an ethanol blend) at the beginning of each shift for the first 48 hours after delivery (RFA). If there is water in the tank – remove it, find out how it got there, and fix it so it does not occur again.
- ☐ **Existing UST conversion:** Within 30 days of changing the substance stored in the UST, submit to DEP a completed form 2630-FM-BECB0607, *Storage Tank Registration Amendment Form*, to amend the UST registration information. Include the completed *Alternative Fuel Storage Tank Installation/Conversion Form.*

Ongoing Maintenance

- ☐ Check regularly for water. No level of water is acceptable for gasoline-ethanol blends.
- ☐ If product seems to pump slowly, check and replace filters.
- ☐ Calibrate the dispenser meter at the time of conversion and two weeks after conversion to verify meter accuracy. Particulate materials may cause excessive wear of the meter, which would require more frequent calibration (API RP 1626).
- ☐ Conduct daily, visual inspections of the dispenser and dispenser sump (secondary containment) beneath the dispenser (if one is installed) and perform periodic walkthrough inspections.

For additional information on Pennsylvania's Storage Tank Program or to obtain forms, contact:

Central Office, Bureau of Environmental Cleanup and Brownfields, Division of Storage Tanks, P.O. Box 8762, Harrisburg, PA 17105-8762, 717-772-5599, 800-42-TANKS (in PA only)

For more information, visit www.dep.state.pa.us, keyword: Storage Tanks.

Alternative Fuel Storage Tank Installation / Conversion Form

- All USTs, and ASTs used for motor vehicle fueling, storing:
  - Gasoline/alcohol blends greater than 10% alcohol (E15, E85)
  - Biodiesel blends greater than 5% biodiesel (B10, B20)
- Ensures compatibility of all system components

2630-FM-BECB0608 5/2014

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF ENVIRONMENTAL CLEANUP AND BROWNFIELDS

ALTERNATIVE FUEL STORAGE TANK INSTALLATION/CONVERSION FORM

FOR DEP USE ONLY
Reviewer: _____
Date: _____

This form is to be completed and signed by the storage tank owner (or owner's representative) and DEP certified tank installer when installing a new storage tank system, or when converting an existing storage tank system, for storage of alternative fuel blends, such as gasoline-ethanol blends containing greater than 10% alternative fuel, or biodiesel or biodiesel blended fuel containing greater than 5% biodiesel. For aboveground storage tank systems, this form only applies to tank systems used for motor vehicle fueling. See the bottom of page 2 for the form submittal and recordkeeping requirements.

DEP recommends that UST owners and operators follow the procedural checklist provided in the Storage Tank Program Fact Sheet 2630-FS-DEP4447 *Underground Storage Tank (UST) Equipment Compatibility & Storage of Biofuels and Biofuel Blends.*

I. **FACILITY INFORMATION** – Type or print (in ink) all items. When completing this form for a new facility, omit the Facility ID.

Facility ID#:	Facility Name:	
Facility Street Address:		
Facility Telephone:	County:	Municipality:

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.

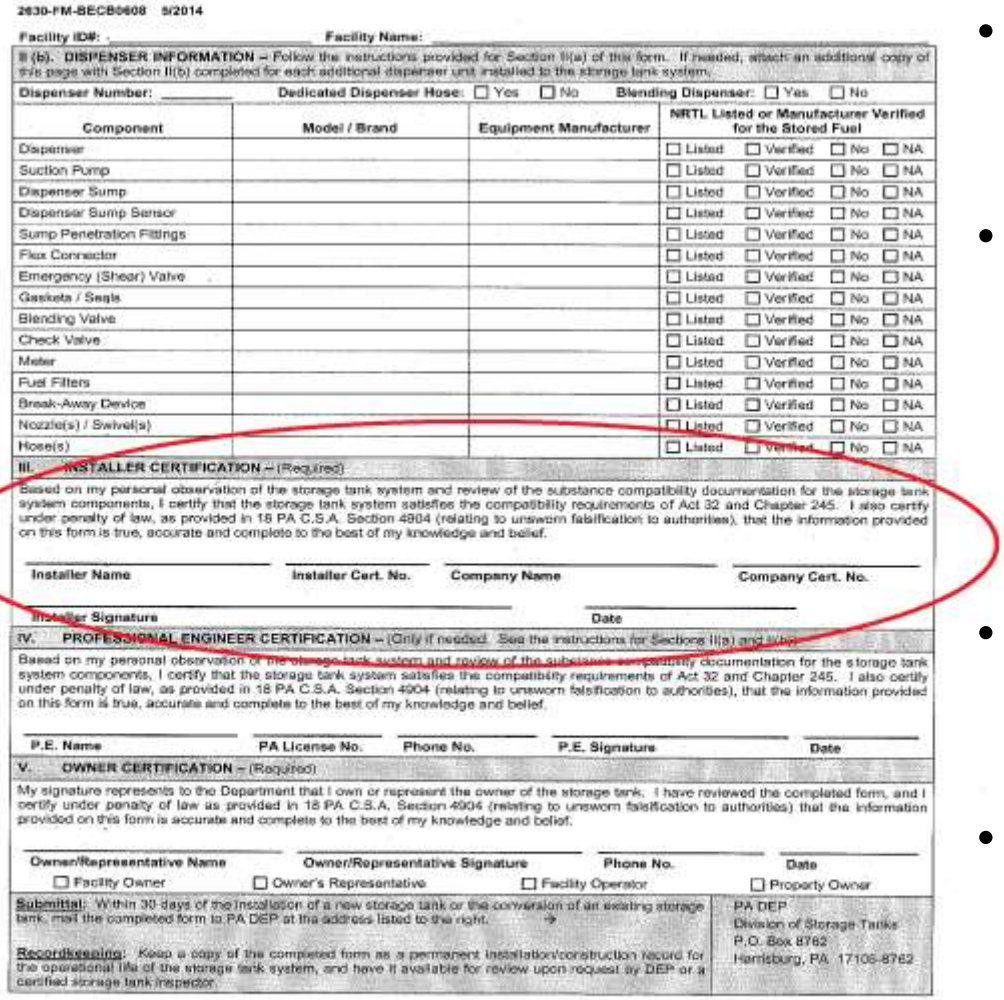
DEP will not approve an operating permit for an alternative fuel storage tank system with "unknown" components, or components that are neither NRTL listed nor manufacturer verified for use with the substance stored, unless a PA licensed professional engineer (P.E.) who has knowledge, experience, and 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.

Tank Orientation: ☐ Underground ☐ Aboveground
Capacity (gallons): _____ Date Installed: _____
☐ New Tank ☐ Existing Tank → DEP Tank #: _____

Alternative Fuel Blend (>10%) Stored
☐ E15 ☐ E85 ☐ Other _____
Biodiesel Blend (>5% biodiesel) Stored
☐ B10 ☐ B20 ☐ Other _____

Component	Model / Brand	Equipment Manufacturer	NRTL Listed or Manufacturer Verified for the Stored Fuel
Storage Tank			☐ Listed ☐ Verified ☐ No ☐ NA
Internal Tank Lining			☐ Listed ☐ Verified ☐ No ☐ NA
ATG Probe, Float / Sensor			☐ Listed ☐ Verified ☐ No ☐ NA
Tank Interstitial Sensor			☐ Listed ☐ Verified ☐ No ☐ NA
Spill Bucket			☐ Listed ☐ Verified ☐ No ☐ NA
Drop Tube			☐ Listed ☐ Verified ☐ No ☐ NA
Overfill Auto Shut-off Valve			☐ Listed ☐ Verified ☐ No ☐ NA
Ball Float Valve			☐ Listed ☐ Verified ☐ No ☐ NA
Product Pipe Information: ☐ New ☐ Existing ☐ Mixed (New & Existing) Product Pipe Configuration: ☐ Single wall ☐ Double wall			
Product Pipe			☐ Listed ☐ Verified ☐ No ☐ NA
Pipe Fitting / Valve Material			☐ Listed ☐ Verified ☐ No ☐ NA

Alternative Fuel Storage Tank Installation / Conversion Form



2630-FM-BECB0608 5/2014

Facility ID#: _____ Facility Name: _____

II (b). DISPENSER INFORMATION – Follow the instructions provided for Section II(a) of this form. If needed, attach an additional copy of this page with Section II(b) completed for each additional dispenser unit installed to the storage tank system.

Dispenser Number: _____ Dedicated Dispenser Hose: ☐ Yes ☐ No Blending Dispenser: ☐ Yes ☐ No

Component	Model / Brand	Equipment Manufacturer	NRTL Listed or Manufacturer Verified for the Stored Fuel
Dispenser			☐ Listed ☐ Verified ☐ No ☐ NA
Suction Pump			☐ Listed ☐ Verified ☐ No ☐ NA
Dispenser Sump			☐ Listed ☐ Verified ☐ No ☐ NA
Dispenser Sump Sensor			☐ Listed ☐ Verified ☐ No ☐ NA
Sump Penetration Fittings			☐ Listed ☐ Verified ☐ No ☐ NA
Flex Connector			☐ Listed ☐ Verified ☐ No ☐ NA
Emergency (Shear) Valve			☐ Listed ☐ Verified ☐ No ☐ NA
Gaskets / Seals			☐ Listed ☐ Verified ☐ No ☐ NA
Blending Valve			☐ Listed ☐ Verified ☐ No ☐ NA
Check Valve			☐ Listed ☐ Verified ☐ No ☐ NA
Meter			☐ Listed ☐ Verified ☐ No ☐ NA
Fuel Filters			☐ Listed ☐ Verified ☐ No ☐ NA
Break-Away Device			☐ Listed ☐ Verified ☐ No ☐ NA
Nozzle(s) / Swivel(s)			☐ Listed ☐ Verified ☐ No ☐ NA
Hose(s)			☐ Listed ☐ Verified ☐ No ☐ NA

III. INSTALLER CERTIFICATION – (Required)

Based on my personal observation of the storage tank system and review of the substance compatibility documentation for the storage tank system components, I certify that the storage tank system satisfies the compatibility requirements of Act 32 and Chapter 245. I also 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 on this form is true, accurate and complete to the best of my knowledge and belief.

Installer Name | Installer Cert. No. | Company Name | Company Cert. No.

Installer Signature | Date

IV. PROFESSIONAL ENGINEER CERTIFICATION – (Only if needed. See the instructions for Sections II(a) and II(b).)

Based on my personal observation of the storage tank system and review of the substance compatibility documentation for the storage tank system components, I certify that the storage tank system satisfies the compatibility requirements of Act 32 and Chapter 245. I also 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 on this form is true, accurate and complete to the best of my knowledge and belief.

P.E. Name | PA License No. | Phone No. | P.E. Signature | Date

V. OWNER CERTIFICATION – (Required)

My signature represents to the Department that I own or represent the owner of the storage tank. I have reviewed the completed form, and 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 on this form is accurate and complete to the best of my knowledge and belief.

Owner/Representative Name | Owner/Representative Signature | Phone No. | Date

☐ Facility Owner ☐ Owner's Representative ☐ Facility Operator ☐ Property Owner

Submittal: Within 30 days of the installation of a new storage tank or the conversion of an existing storage tank, mail the completed form to PA DEP at the address listed to the right. →

Recordkeeping: Keep a copy of the completed form as a permanent installation/construction record for the operational life of the storage tank system, and have it available for review upon request by DEP or a certified storage tank inspector.

PA DEP
Division of Storage Tanks
P.O. Box 8762
Harrisburg, PA 17105-8762

- 2 -

- The form is signed by the tank owner or owner's representative.
- The form is signed by a Professional Engineer for any components that have unknown compatibility, is unlisted, or the manufacturer's certification is not available.
- Finally, the form is signed by the PA DEP certified installer (UMX or AMMX).
- **The ultimate responsibility lies on the UMX/AMMX to ensure that all system components are compatible with the substance stored.**

2007 REGULATION CHANGES

§ 245.1 – Definitions

- **Re-regulates large aboveground heating oil tanks greater than 30,000 gallons capacity where the product is consumed on the premises where stored**
- **Registration of existing tanks was to have been accomplished by January 9, 2008**
- **Requires most combination of tanks (manifold systems) to be registered separately**

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

2007 REGULATION CHANGES

§ 245.1 – Definitions

Regulated substances now include:

- **Biodiesel**
- **Synthetic fuels and fluids (motor oil)**
- **Ethanol intended for blending with motor fuel**
- **Several non-petroleum oils**

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

Notable Changes to Certifications

- ***AFMX* – Now permits the *modification of tank components* of an aboveground manufactured storage tank system. (ex: nozzle, manway, etc.) AMMX still needed to *install* a manufactured tank system.**

- ***TL* - For purposes of corrosion protection, installation or repair of an internal UST lining is no longer permitted. A certified TL may evaluate the integrity of an internal UST lining or supervise the evaluation of the lining.**

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Storage Tank Closure

- **Closure Notification**
  - **Submit to Department regional office 30 days before scheduled date of removal – serves notice of intent to close or remove tank (USTs or Large ASTs)**
    - **This is a dual purpose form, also used to notify DEP of intent to install (USTs)**
- **Closure Report (USTs or Large ASTs)**
  - **When required the report is sent to the applicable Department regional office**
- **Registration/Permitting Application**
  - **The only way to remove tanks from system inventory**

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Storage Tanks Website

www.dep.pa.gov

Businesses →

Land →

Storage Tanks

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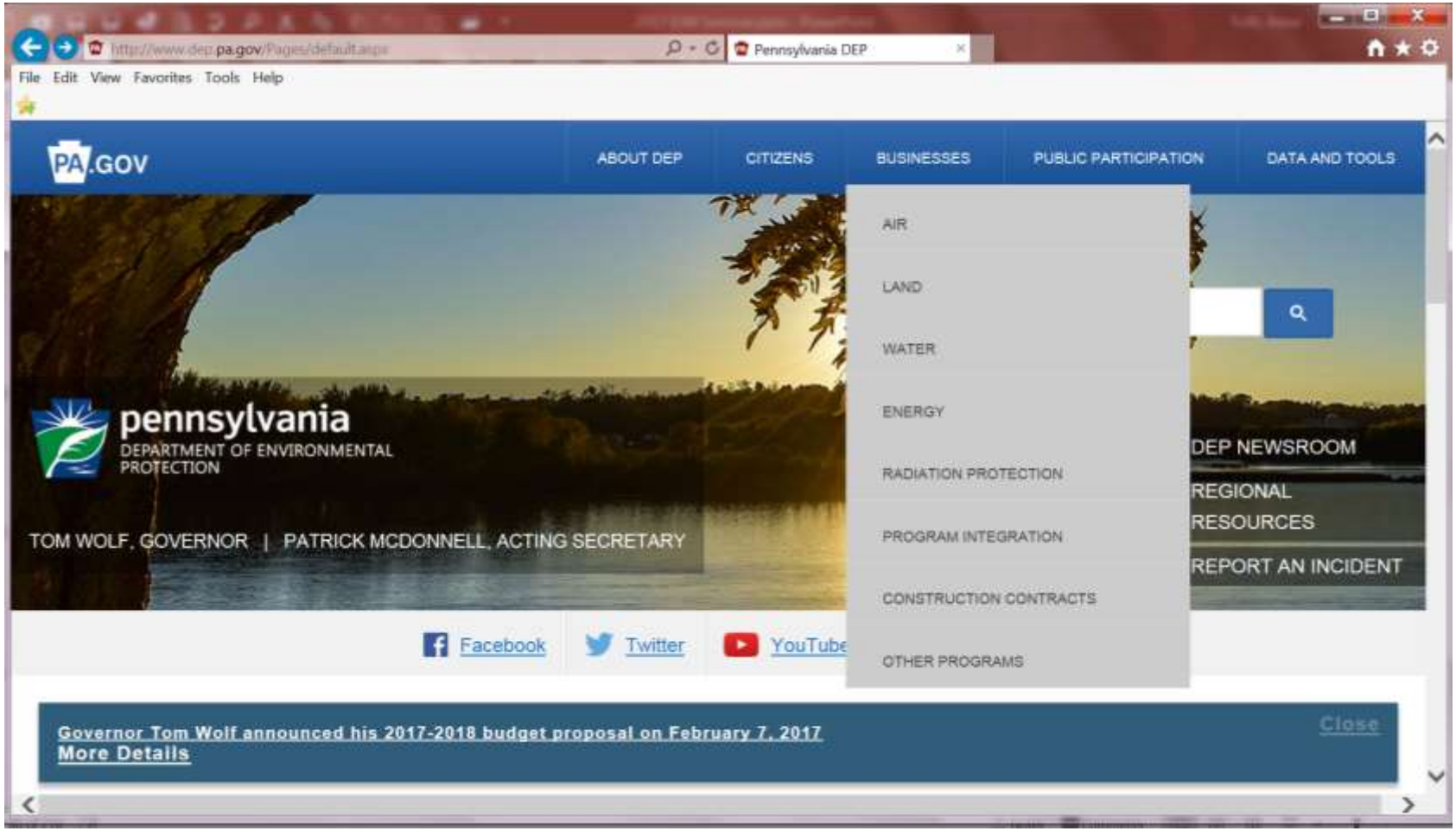
Storage Tanks Website



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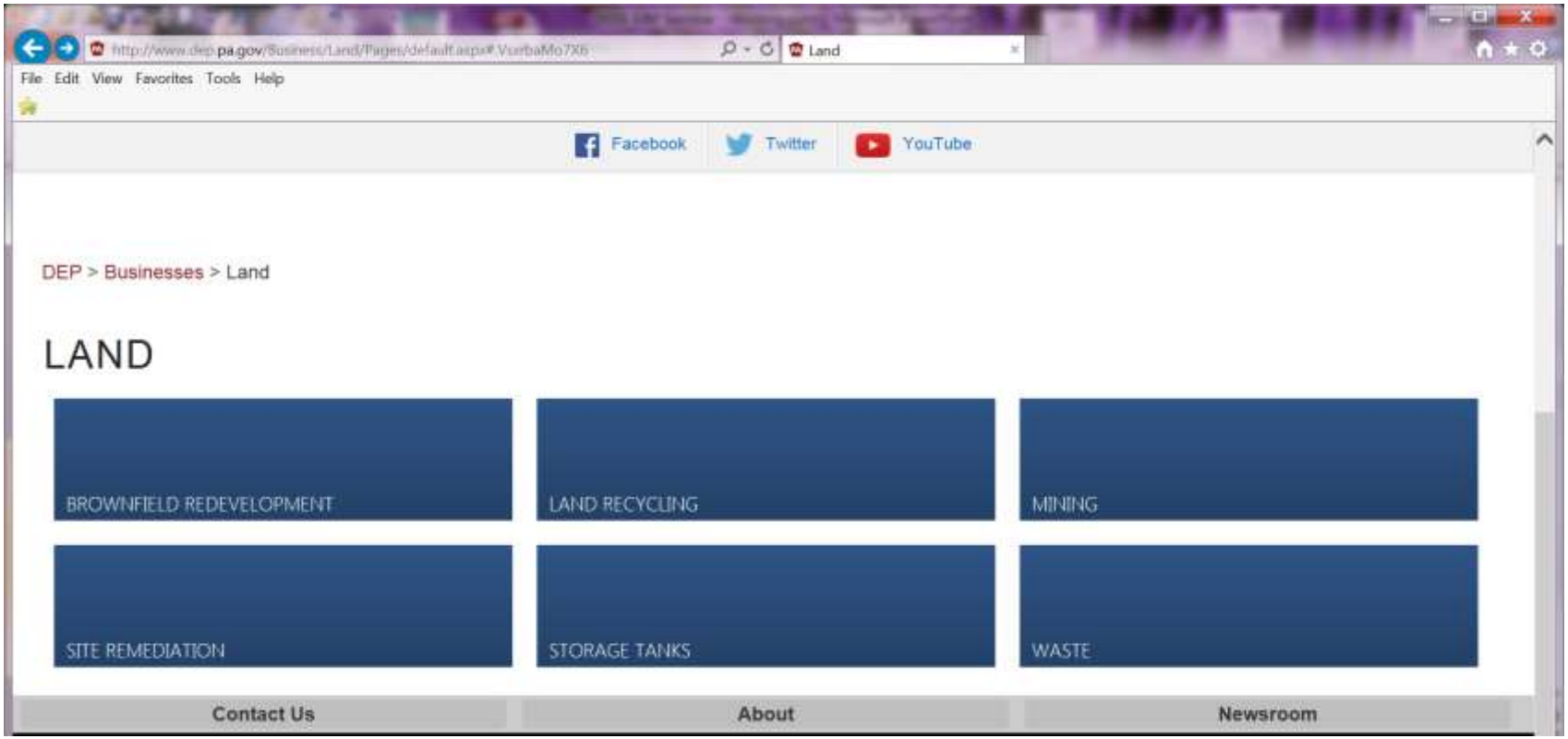
Storage Tanks Website



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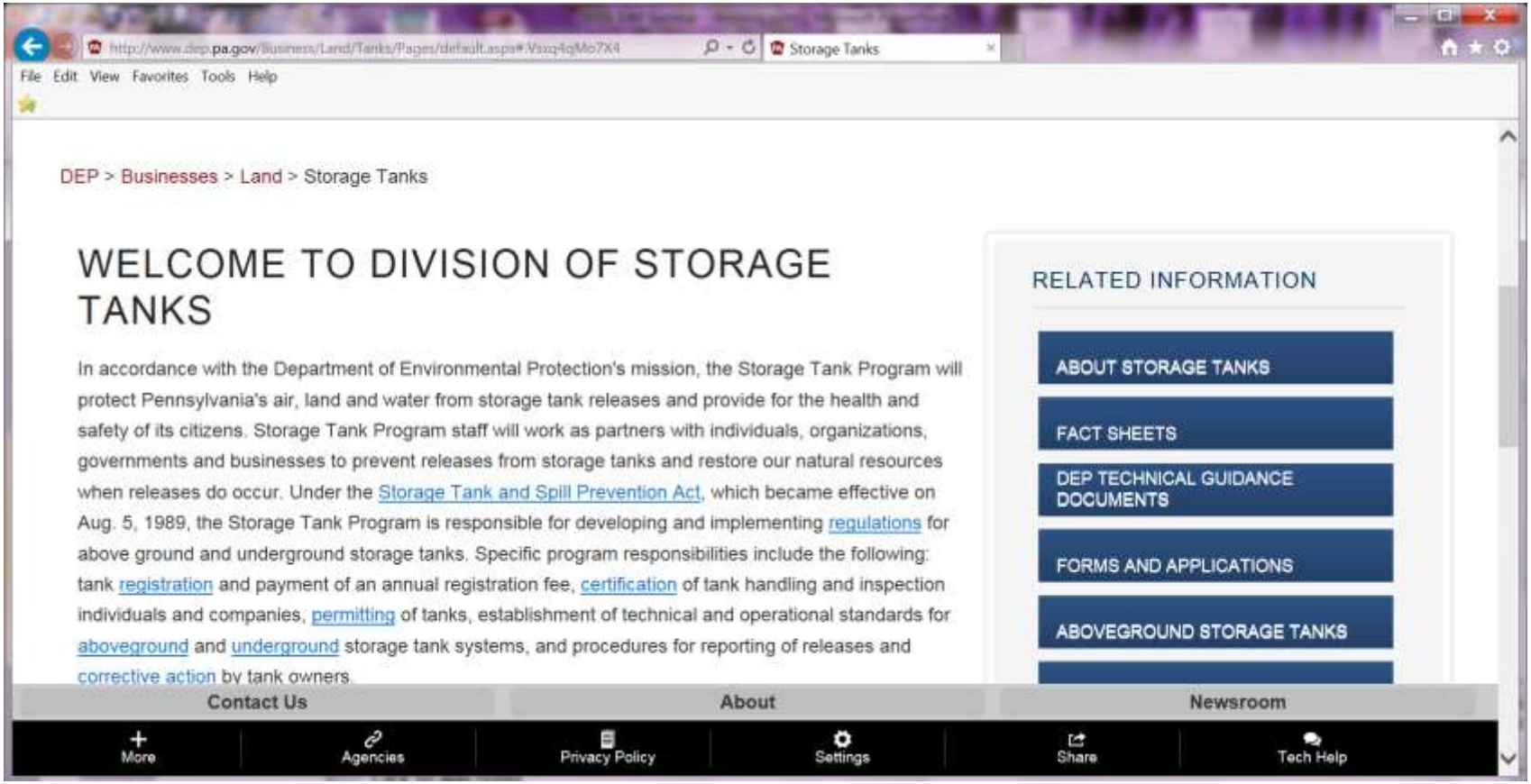
Storage Tanks Website



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Administrative Summary

- **Submit documents, reports, applications on current forms**
  - **Tank handling activities within 30 days of completion**
  - **Inspection activities 60 days from date of inspection**
  - **Inspections as part of a project involving multiple certified individuals and certification categories should be submitted 30 days from completion of the project. Signature dates should never precede an install date!**
- **New Alternative Fuel Storage Tank Installation / Conversion Form**
- **Pay attention to your certification expiration date**
- **Renew certification 60-120 days prior to expiration date**
- **Requests for renewal of certification submitted more than 60 days beyond expiration date requires applicant to meet initial requirement for certification (see handout – Qualifications for Initial Applicants)**
- **Update individual and company information as changes occurr**

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Administrative Summary

- **Certified companies and certified individuals share responsibility for all activities, and for the timely submission of all reports or project-related forms**
- **Certify safety training and application accuracy**
- **All tank handling or inspection activities involving non-certified employees or personnel are to be supervised by a certified installer or certified inspector with the applicable certification**
- **Do not sign tank handling or inspection documents unless you performed or supervised the certified activity**
- **Please don’t refer tank owners to the Pollution Prevention Reimbursement Grant Program (pump & plug) without confirming eligibility**
- **Companies, pay TIIP fees!**

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Department Contact Information

PA DEP
Rachel Carson State Office Building
400 Market Street
P.O. Box 8763
Harrisburg, PA 17105-8763
Phone: 1-800-42-TANKS (in PA)
717-772-5599
FAX: 717-772-5598
Web address: www.dep.pa.gov

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Let’s take a 10 minute break!

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Where do Pennsylvania facilities stand with the US EPA?

- As of March 31, 2018, there were 22,309 regulated underground storage tanks located at 7,681 facilities.
- Between October 1, 2017, and March 31, 2018, 1263 third-party and 293 Pennsylvania DEP staff inspections were performed for a total of 1,556 initial, onsite inspections.
- Between October 1, 2017, and March 31, 2018, Pennsylvania DEP staff performed 454 follow-up inspections performed as the result of violations discovered during third-party inspections.

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Where do Pennsylvania facilities stand with the US EPA?

- As of March 31, 2018, the Pennsylvania DEP's Overall Significant Operational Compliance (SOC) rate for underground storage tanks was 71.8%.
- Between October 1, 2017, and March 31, 2018, the Pennsylvania DEP took 105 formal Enforcement Actions, including 17 Delivery Prohibitions and 4 Ordered Shutdowns. A total of $184,438 was collected as a result of 37 penalty actions.

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UST Technical Information

Presented by:

UST Technical Staff

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New Item Highlights

- Notice:
  - September 21, 2017
  - Ball Float Vent Valve and Drop Tube Shutoff Valve Installation Concerns
  - **Summary:** Ball Floats and all associated components (pipe stub) should be removed with the installation of a drop tube shutoff valve.
  - **See Also:** Lustline #79 December 2015 'Tank-nically Speaking' by Marcel Moreau for in depth discussion on the risks involved.
- Notice:
  - December 14, 2016
  - Rescission of Previously Issued Technical Bulletin: Replacement of Pipe Extracted Through a Chase Pipe
  - **Summary:** All containment sumps used for interstitial monitoring must be liquid tight – No Alternative Methods

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New Item Highlights

- **Stage II Dispenser Replacement:**
  - Published November 12, 2016
  - Requires notice to DEP Regional Office, Philadelphia Air Management Services or Allegheny County Health Dept.
  - Information was emailed to you
  - Don’t Forget to submit your Modification Report within 30 days of completion of work

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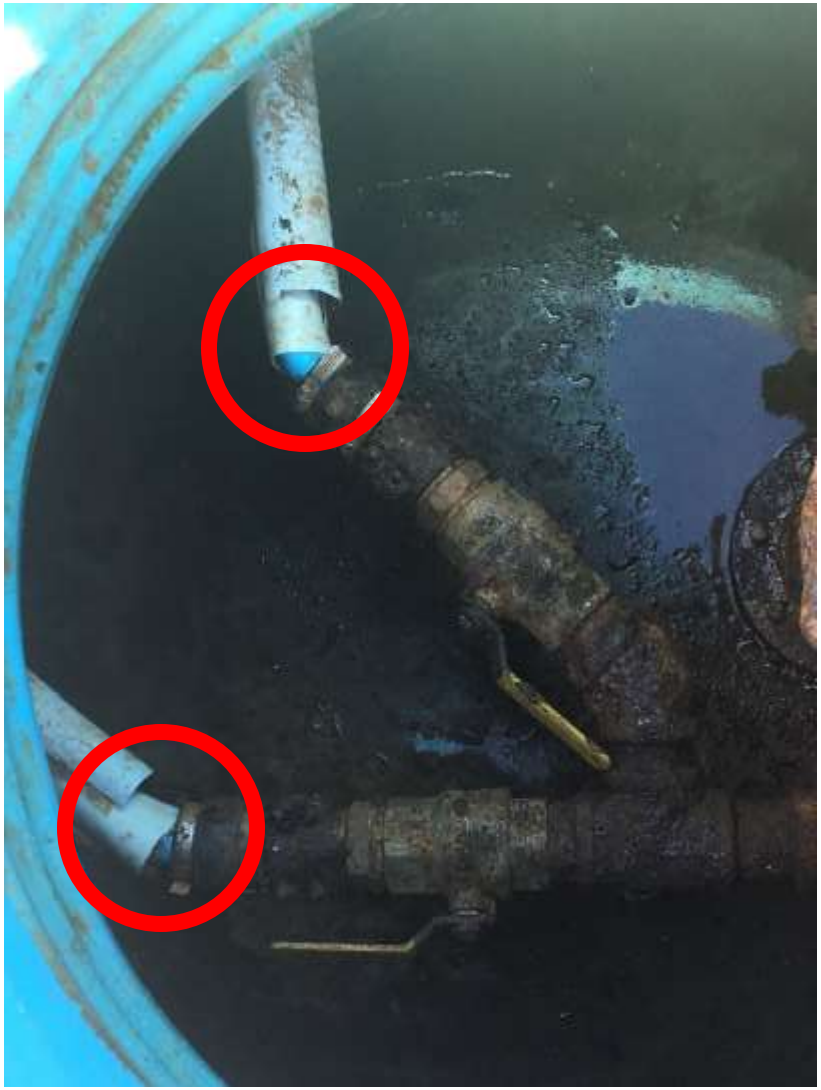
What do You See?



Department Concerns

- Modification Report Submission
  - All certified tank handling activities must be reported to the department.
    - 263-0900-011 Storage Tank Modification and Maintenance Issues – March 29, 2014
  - The Department has identified instances where certified companies have failed to submit Modification Reports for years.
- Compliance Documentation
  - Poor CP Documentation
  - Containment Testing Documentation
    - Original Documentation?
    - Checking during the FOIs?
  - Modification Reports
    - Each Mod Report should be documented on the FOI.

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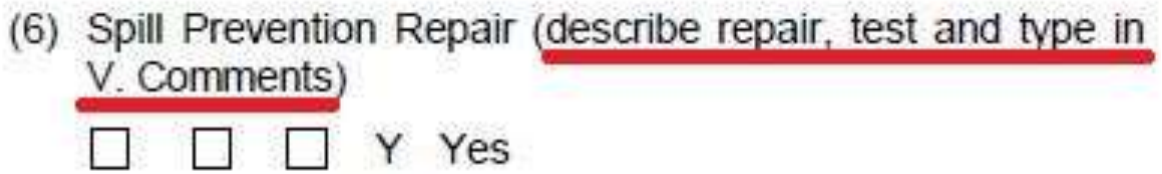
Department Concerns

- Poor Comment Details:
  - UMXs and Modification Reports:
    - Modification Reports specify on Page 2 what required comments are necessary for specific tank handling activities. These items are often missing.
    - In addition, any additional important details that explain the changes to the tank and piping systems which may include site diagrams should also be included.
    - All activities that are considered tank handling activities and any relevant maintenance activities that support those activities should be clear through the checkboxes on Page 2 and the comments on Page 3.


(6) Spill Prevention Repair (describe repair, test and type in V. Comments)

☐ ☐ ☐ Y Yes

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Department Concerns

- Poor Comment Details:
  - IUMs and FOI Reports:
    - Facility Operation Inspection Report Forms also often detail when comments should be added.
    - Additionally, the FOI Instructions form includes a paragraph that details the minimum areas expected in the comments. Examples include:
      - ‘Other’ tank system attributes
      - Tank System Modifications with date
      - Suspected Contamination
      - Estimated install date when actual date is unknown
      - Specific Months with Missing, Invalid, Failing or Inconclusive Release Detection Results.
      - Descriptions of Suspected Release Investigations

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Department Concerns

- Poor Comment Details:
  - Remember
    - A goal of your reports is to allow the Department to understand how the facility meets the requirements of our regulations without having ever physically visited the site.
- Poor Comments: Unique Piping Configurations
  - See FOI Instructions
    - Details should be complete including length, sumps, installation dates and types of construction.
    - Release detection methods should be certified to work with the unique configuration to be considered valid.
  - Emergency Generators
    - See Page 3 of FOI Instructions
      - If there is supply and return the code should be B

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What do You See?

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Dispenser Knockdown

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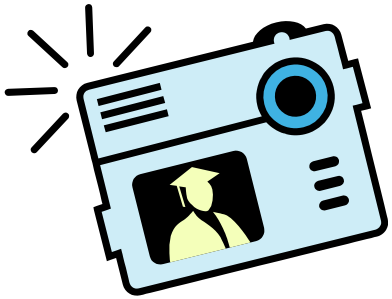
Tools

- **Digital Camera**
- Take pictures of everything



- Many unseen problems are found when reviewing pictures back in the office
- **Pictures can clarify what you witnessed if UST Technical Staff have follow-up questions.**

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Tools

- **Digital Camera**
  - Pictures have often resolved questions about construction design and configuration when other paperwork has been lost or mistakes were made.
    - As digital cameras/camera phones have become a widely available resource these can act as a secondary tool for recording tank handling & inspection activities in support of the written documentation.

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Tools

- **Documents**
  - **Fact Sheets**
  - **Registration Amendment Forms**
  - **DEP Phone Numbers**
  - **Guidelines for Conducting UST FOIs and FOI Instructions or Storage Tank Modification and Maintenance Issues**
  - **Corrosion Protection Guidance**
- **Pass Operator Training Verification Website**
  - **Check Serial # @ passtesting.com/verify**

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What do You See?

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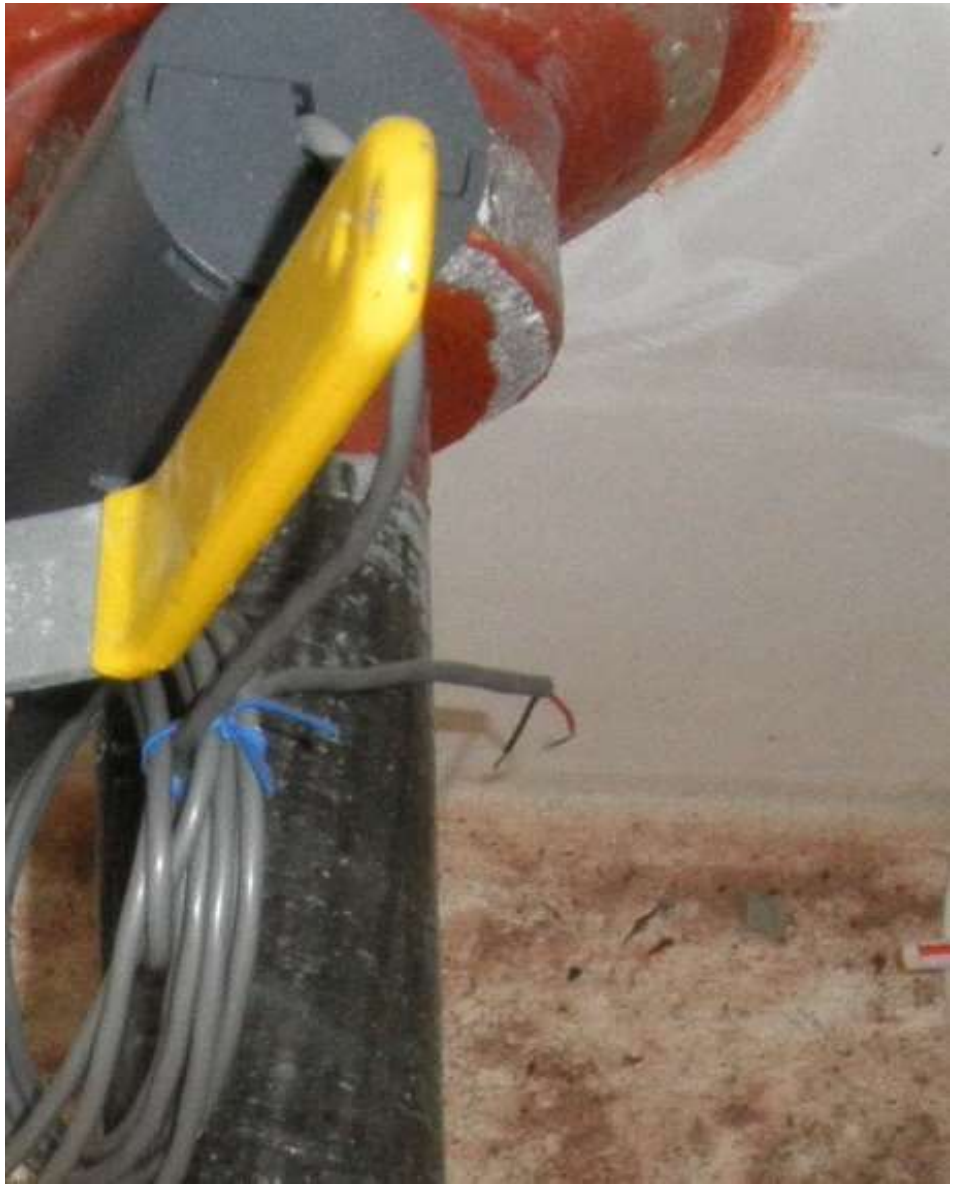
What do You See?



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What do You See?

Testing Documentation

CORROSION

PROTECTION

2630-FM-BECB0610 Rev. 9/2015

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU ENVIORNMENTAL CLEANUP AND BROWNFIELDS

UST CATHODIC PROTECTION SYSTEM EVALUATION FORM

This form may be utilized to evaluate underground storage tank (UST) cathodic protection systems.

- Access to the soil directly over the cathodically protected structure that is being evaluated should be provided.
- A site drawing depicting the UST cathodic protection system and all reference electrode placements must be completed if this form is used.

The criteria that are used to determine that cathodic protection is adequate as required by the Storage Tank Act shall be in accordance with a code of practice developed by a Nationally recognized association.

I. FACILITY INFORMATION – Type or print (in ink) all items.

Facility ID #:	Facility Name:	
Facility Street Address:		
Facility Telephone:	County:	Municipality:

II. REASON SURVEY WAS CONDUCTED – Mark only one.

☐ Routine / Required
☐ Post-Installation – within 6 months of installation
☐ Re-survey after fail
☐ Re-survey after repair/modification

Cathodic Protection Survey Date: _____

Date next cathodic protection survey due: _____
(Required within 6 months of installation/repair and at least every 3 years thereafter).

SYSTEM TYPE – Mark one or both
☐ Galvanic
☐ Impressed Current

III. CATHODIC PROTECTION TESTER'S EVALUATION – Mark only one.

☐ **Pass**	All protected structures at this facility pass the cathodic protection survey and it is judged that adequate cathodic protection has been provided to the UST system(s).
☐ **Fail**	One or more protected structures at this facility fail the cathodic protection survey and it is judged that adequate cathodic protection has not been provided to the UST system(s).
☐ **Inconclusive**	The cathodic protection tester is unable to conclusively evaluate the cathodic protection system.

Tester's Name:	Company Name:	
Address:	City/State:	Phone:
Certification Source/Type:	Certification #:	
Nationally Recognized Association Followed for Test:		
Tester's Signature:	Date Signed:	

Testing Documentation

CORROSION

PROTECTION

The Department will evaluate Corrosion Protection Surveys based on the Nationally Recognized Association's guidelines for conducting the survey.

Tester's Name:	Company Name:	
Address:	City/State:	Phone:
Certification Source/Type:		Certification #:
Nationally Recognized Association Followed for Test:		
Tester's Signature:		Date Signed:

The Department reserves the right to consider any facility **noncompliant** where Corrosion Protection surveys provided do not meet minimum documentation as required by both the Department's guidance document 263-4200-002 and by the Nationally Recognized Association followed for the test.

The Department does not accept testing that fails to follow a Nationally Recognized Association's testing protocol.

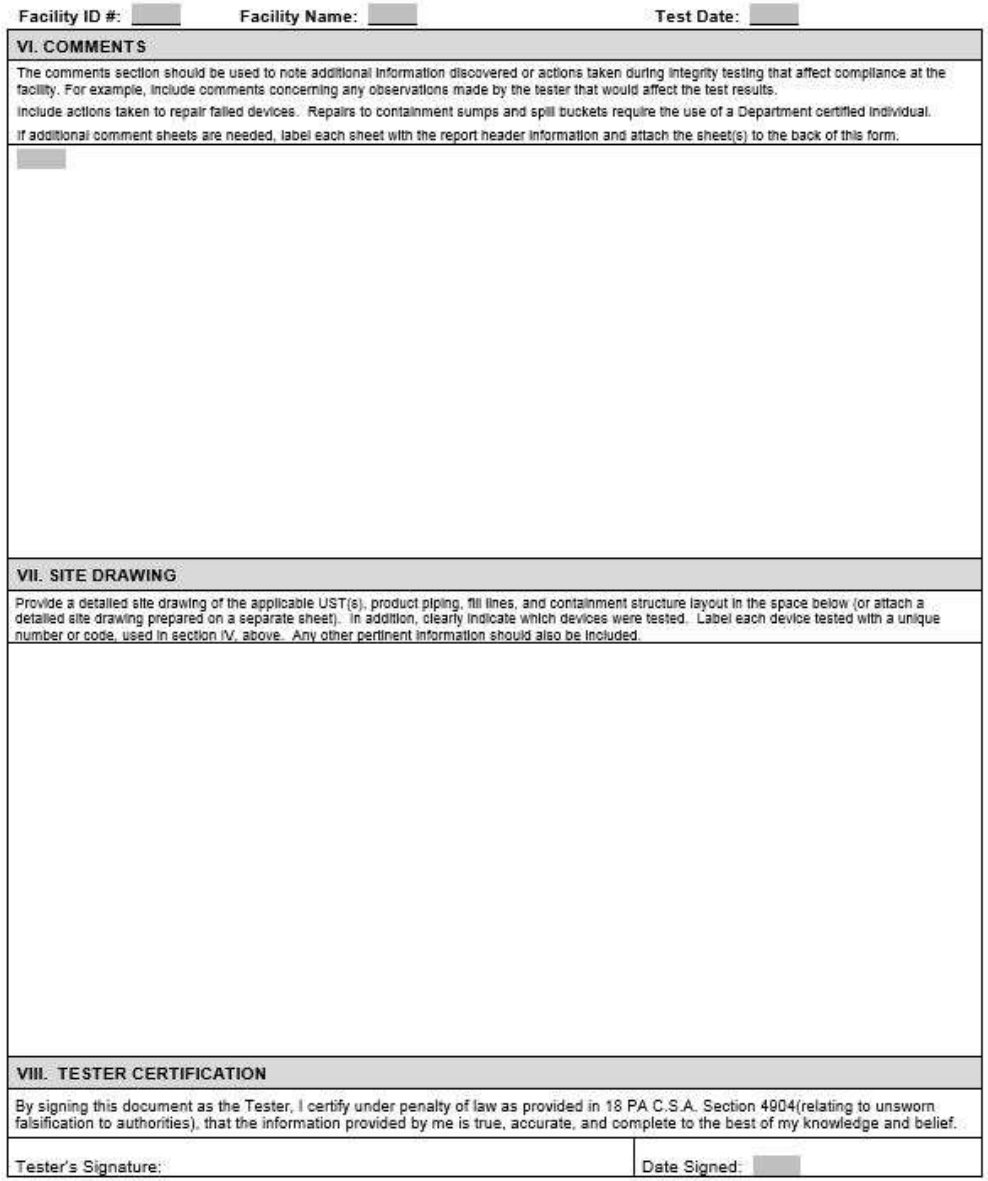
Sample/Draft Testing Documents

UNDERGROUND STORAGE TANK
SPILL BUCKET/CONTAINMENT INTEGRITY TESTING FORM

I. FACILITY INFORMATION – Type or print (in ink) all items.					
Facility ID #:		Facility Name:			
Facility Street Address:					
Facility Telephone:		County:		Municipality:	
II. TESTER INFORMATION					
Tester's Name:		Company Name:			
Tester's Telephone:		Individual Cert. # (if applicable):		Test Date:	
III. TEST METHOD					
Method Used	☐ Hydrostatic ☐ Vacuum ☐ Pressure ☐ Other				
Method Developer	☐ Manufacturer ☐ Industry Standard ☐ Other				
IV. CONTAINMENT AND TESTING INFORMATION					
Tank Number					
Product Stored					
Containment Number[1]					
Containment Type	☐ Dispenser ☐ Piping Sump ☐ Fill Spill Bucket ☐ Vapor Spill Bucket	☐ Dispenser ☐ Piping Sump ☐ Fill Spill Bucket ☐ Vapor Spill Bucket	☐ Dispenser ☐ Piping Sump ☐ Fill Spill Bucket ☐ Vapor Spill Bucket	☐ Dispenser ☐ Piping Sump ☐ Fill Spill Bucket ☐ Vapor Spill Bucket	☐ Dispenser ☐ Piping Sump ☐ Fill Spill Bucket ☐ Vapor Spill Bucket
Containment Capacity					
Manufacturer					
Model[2]					
Visual Inspection	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail
Portion Tested[3]					
Test Start Time					
Test Start Level					
Test End Time					
Test End Level					
Test Period					
Level Change					
Pass/Fail Threshold					
V. TEST RESULT[4]	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail

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.)
3. If the entire depth of the device was not tested, specify how much was tested. Testing must be at least to the top of the highest penetration in the device.
4. Failed test results may constitute a suspected release. Facility owners/operators must investigate suspected releases within 7 days. If a reportable release is confirmed, it must be reported to the Department by telephone within 24 hours and in writing within 15 days.

Sample/Draft Testing Documents



Facility ID #: Facility Name: Test Date:

VI. COMMENTS

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.

Include actions taken to repair failed devices. Repairs to containment sumps and spill buckets require the use of a Department certified individual.

If additional comment sheets are needed, label each sheet with the report header information and attach the sheet(s) to the back of this form.

VII. SITE DRAWING

Provide a detailed site drawing of the applicable UST(s), product piping, fill lines, and containment structure layout in the space below (or attach a detailed site drawing prepared on a separate sheet). In addition, clearly indicate which devices were tested. Label each device tested with a unique number or code, used in section IV, above. Any other pertinent information should also be included.

VIII. 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 is true, accurate, and complete to the best of my knowledge and belief.

Tester's Signature: Date Signed:

Highlights:

- Facility Clearly Identified
- Tester & Contact Clearly Noted
- Test Method Details
  - Type of Test
  - Standard Used
- Information about Containment
  - Manufacturer
  - Model
- Clear Pass/Fail Designation
- Tester Signature & Date
  - In addition to the name clearly printed or typed

Sample/Draft Testing Documents

UNDERGROUND STORAGE TANK
SENSOR FUNCTIONALITY TESTING FORM

I. FACILITY INFORMATION – Type or print (in ink) all items.		
Facility ID #:	Facility Name:	
Facility Street Address:		
Facility Telephone:	County:	Municipality:
II. TESTER INFORMATION		
Tester Name:	Tester Cert. # (if applicable):	Tester Telephone:
Company Name Telephone:	Company Cert. # (if applicable):	Test Date:
III. TEST PROCEDURE – Briefly describe procedure(s) used to test the sensors (i.e. PEI/REP1200, manufacturer's testing procedure, etc.)		

IV. SENSOR AND TESTING INFORMATION					
Sensor Location					
Sensor Number[1]					
Manufacturer					
Model					
Sensor Type	☐ Discriminating ☐ Non-Discriminating	☐ Discriminating ☐ Non-Discriminating	☐ Discriminating ☐ Non-Discriminating	☐ Discriminating ☐ Non-Discriminating	☐ Discriminating ☐ Non-Discriminating
Test Liquid (if applicable)	☐ Water ☐ Product ☐ N/A	☐ Water ☐ Product ☐ N/A	☐ Water ☐ Product ☐ N/A	☐ Water ☐ Product ☐ N/A	☐ Water ☐ Product ☐ N/A
Is the ATG console clear of alarms?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
Is the sensor properly positioned?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
Is the sensor in a good state of repair?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
Does the sensor trigger an alarm when placed in the test liquid?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
Is the sensor correctly identified on the ATG?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
Does a sensor alarm automatically disable the pump? [2]	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
V. TEST RESULT[3]	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail	☐ Pass ☐ Fail

1. Designate each sensor tested numerically or by code on the site drawing.
2. Required for pressurized piping systems installed after November 10, 2007.
3. Failed sensors must be repaired or replaced immediately.

Sensor Functionality Testing

Highlights:

- Page 2 the same as Containment
- Clear Identification of Tester & Facility
- Clear Identification and Location of each Sensor:
  - Numbering + Site Diagram
- Detail of Test Procedure
- Detail of Sensor
- Clear Test Results

Sample/Draft Testing Documents

UNDERGROUND STORAGE TANK
OVERFILL PREVENTION FUNCTIONALITY TESTING FORM

I. FACILITY INFORMATION – Type or print (in ink) all items.

Facility ID #:	Facility Name:	
Facility Street Address:		
Facility Telephone:	County:	Municipality:

II. TESTER INFORMATION

Tester Name:	Tester Cert. #:	Tester Telephone:
Company Name:	Company Cert. #:	Test Date:

III. TANK AND DEVICE INFORMATION

Tank Number					
Tank Capacity					
Tank Diameter					
Product Stored					
Overfill Manufacturer					
Overfill Model					
Product Delivery Method	☐ Pressurized ☐ Gravity	☐ Pressurized ☐ Gravity	☐ Pressurized ☐ Gravity	☐ Pressurized ☐ Gravity	☐ Pressurized ☐ Gravity
Overfill Type	☐ Drop Tube Shutoff ☐ Alarm ☐ Ball Float ☐ Whistle Vent	☐ Drop Tube Shutoff ☐ Alarm ☐ Ball Float ☐ Whistle Vent	☐ Drop Tube Shutoff ☐ Alarm ☐ Ball Float ☐ Whistle Vent	☐ Drop Tube Shutoff ☐ Alarm ☐ Ball Float ☐ Whistle Vent	☐ Drop Tube Shutoff ☐ Alarm ☐ Ball Float ☐ Whistle Vent

IV. TEST INFORMATION (Complete all applicable overfill types)

A. DROP TUBE SHUTOFF DEVICE

Drop tube and float free of debris?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Float and poppet move freely?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Poppet enters flow path when float is engaged?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Tank capacity when flow is stopped (%)										

B. OVERFILL ALARM

Visible or audible to delivery driver?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Probe and float in good condition?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Float moves freely?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Does simulated overfill trigger alarm?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Tank capacity when alarm is triggered (%)										

Facility ID #: Facility Name: Test Date:

C. BALL FLOAT VALVE

Standard drop tube installed?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Remote fill present?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Ball and cage present and in good state of repair?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Ball moves freely in cage?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Tank capacity when flow is restricted (%)										

D. WHISTLE VENT ALARM ☐ Permanently Installed ☐ Contract with Delivery Company

Audible to delivery driver?	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No	☐Yes	☐No
Tank capacity when whistle stops (%)										

V. TEST RESULTS Any "No" answer in Section IV. indicates the overfill device fails or required further evaluation. Failure of any overfill prevention device requires immediate repair or replacement. Underground Storage Tanks may not receive product deliveries without functional overfill prevention.

	☐Pass	☐Fail	☐Pass	☐Fail	☐Pass	☐Fail	☐Pass	☐Fail	☐Pass	☐Fail

VI. COMMENTS

The comments section should be used to note additional information discovered or actions taken during functionality testing that affect compliance at the facility. For example, include comments concerning any observations made by the tester that would affect the test results.

Include actions taken to repair or replace failed devices. **Installation, repair and removal of overfill prevention devices requires the use of a Department certified individual.**

If additional comment sheets are needed, label each sheet with the report header information and attach the sheet(s) to the back of this form.

VII. 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 is true, accurate, and complete to the best of my knowledge and belief.

Tester's Signature:	Date Signed:

Sample/Draft Testing Documents

Overfill Prevention Functionality Testing

Highlights:

- Clear Identification of Tester & Facility
- Clear Identification of Delivery Method
- Manufacturer
- Model
- Clear Test Results

Sample/Draft Testing Documents

UNDERGROUND STORAGE TANK
PIPING/TANK INTERSTITIAL INTEGRITY TESTING FORM

I. FACILITY INFORMATION – Type or print (in ink) all items.		
Facility ID #:	Facility Name:	
Facility Street Address:		
Facility Telephone:	County:	Municipality:
II. TESTER INFORMATION		
Tester Name:	Individual Cert. #:	Tester Telephone:
Company Name:	Company Cert. #:	Test Date:
III. REASON FOR TESTING		
☐ Initial ☐ Routine ☐ Release Investigation ☐ Other		
IV. TEST METHOD		
Method Used ☐ Vacuum ☐ Pressure ☐ Liquid/Brine ☐ Other		
Method Developer ☐ Manufacturer ☐ Industry Standard ☐ Other		

V. EQUIPMENT AND TESTING INFORMATION									
Equipment Tested	☐ Tank	☐ Piping	☐ Tank	☐ Piping	☐ Tank	☐ Piping	☐ Tank	☐ Piping	☐ Tank ☐ Piping
Tank Number									
Tank Capacity									
Piping Run[1]		☐ N/A		☐ N/A		☐ N/A		☐ N/A	☐ N/A
Length of Piping Run		☐ N/A		☐ N/A		☐ N/A		☐ N/A	☐ N/A
Product Stored									
Manufacturer									
Construction Type[2]									
Test Start Time									
Initial Test Level									
Test End Time									
Final Test Level									
Test Period									
Level Change									
Pass/Fail Threshold									
VI. TEST RESULT[3]	☐ Pass	☐ Fail	☐ Pass	☐ Fail	☐ Pass	☐ Fail	☐ Pass	☐ Fail	☐ Pass ☐ Fail

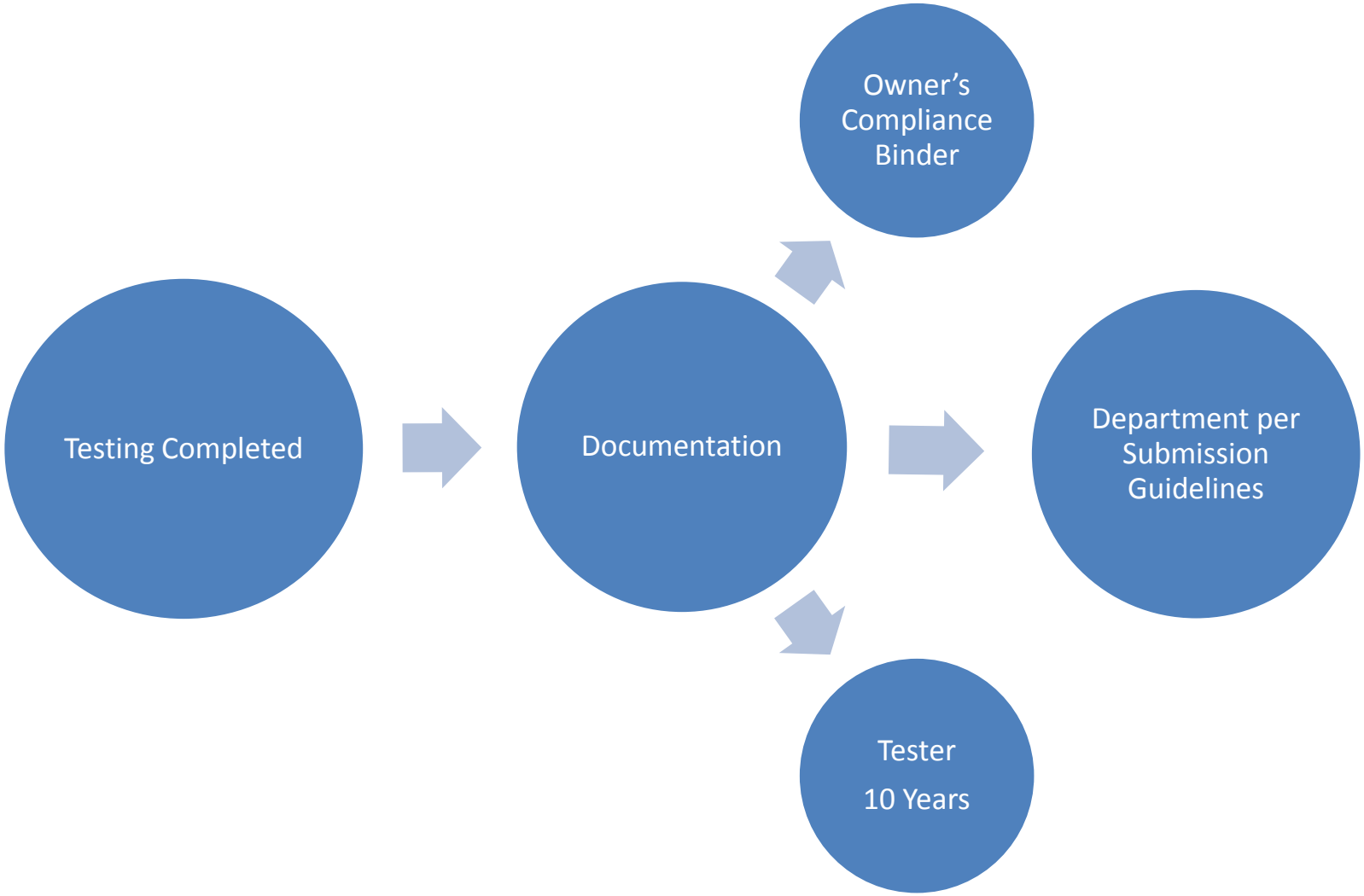
1. Designate each piping run tested, numerically or by code, on the site drawing.
2. Describe equipment construction (Single-walled/Double-walled, Fiberglass, Flex, Steel)
3. Failed test results may constitute a suspected release. Suspected and confirmed contamination must be reported to the Department by certified individuals within 48 hours. Facility owners/operators must investigate suspected releases within 7 days. A confirmed release must be reported to the Department by telephone within 24 hours and in writing within 15 days.

Piping/Tank Interstitial Integrity Testing

Highlights:

- Page 2 the same as Containment
- Clear Identification of Tester & Facility
- Clear Identification of Test Method & Standard
- Clear Test Results

Testing Documentation



We Get It!

The UMX & the Mod Report

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Missing Submissions

Modification Report Submission

The Department has found:

- Companies that NEVER Submit
- Companies that Submit improperly
  - Only to specific a regional office (not even the correct one)
  - Only to a specific individual (who in some cases retired)
- Companies who change staff and the above happens

MODIFICATION REPORT DISTRIBUTION: Copies of the modification report are to be kept and maintained by the certified installer and tank owner. The original and one copy of the modification report is to be submitted to the Department (as shown below) within **30** days after the modification activity is completed. The mailing address is:

Original: Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
Division of Storage Tanks
P.O. Box 8763
Harrisburg, PA 17105-8763

Copy: Owner

Copy: Appropriate DEP regional office (see below)

Copy: Installer's file - keep for 10 years, minimum

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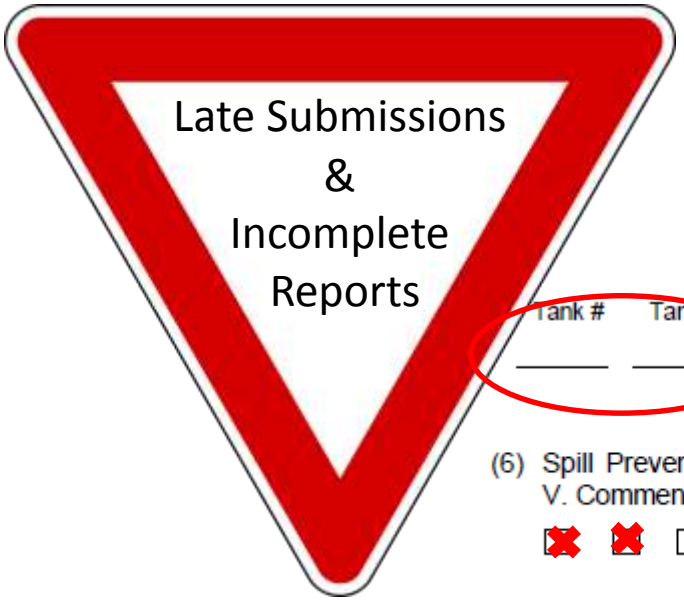
Incomplete Reports



Modification Report Submission

For Example:

Tank # Tank # Tank #

(6) Spill Prevention Repair (describe repair, test and type in V. Comments)

☒ ☒ ☐ Y Yes

V. COMMENTS (Describe activity completed in detail. Explain "other" modi

Replaced Spill Containment

Several Questions:

1. Which Tanks
2. What was the Test
3. What was the result of the test
4. See Chapter 243.421(b)(4)(ii)

This Modification Report is Incomplete without this information.

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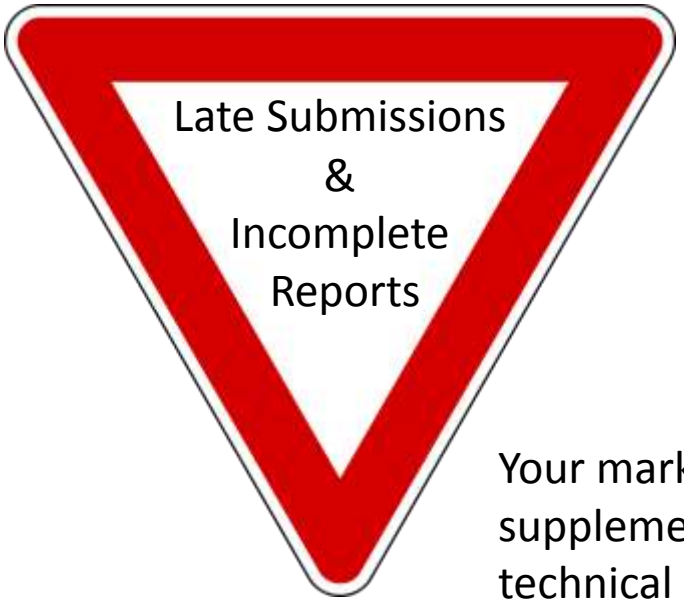
Incomplete Reports



Modification Report Submission

The certified installer(s) sign the Modification Report legally verifying that the information is true, accurate, and complete.

Your marks on Page 2, comments, site diagrams and supplementary documentation submitted should ensure that a technical reviewer, who has not visited the site, will be able to identity all tank handling activities regulated by this act which were conducted in relation to the Modification report.

VI. INSTALLER CERTIFICATION

This Section must be completed by the certified installer(s) for modifications performed on underground storage tank systems. By signing below, the certified installer verifies that the tank handling activity was conducted in compliance with the standards of Act 32 and applicable regulations. The signature also certifies, under penalty of law as provided in 18 PA C.S.A. Section 4904 (relating to unsworn falsification to authorities), that the information provided is true, accurate, and complete to the best of his/her knowledge and belief.

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Incomplete & Late

Modification Reports are due within **30** days of work completion.

Modification Report Submission

Contact Information and Responsiveness to Department requests:

- It is important that you maintain accurate contact information with Certification staff.
- It is important that you respond in a timely manner to requests for additional information or clarification during Modification Report review.
- Note: Incomplete Modification Reports are not considered submitted to the department until they have been properly completed.

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Testing Requirements

Required Testing

Chapter 245 Section 421

Page 2 of the Modification Report details items where testing should be described in the comments. **Results should be clearly noted.**

- Testing Documentation
  - Required Recordkeeping
    - UMX – 10 Years
    - Owner – Life of Tank + 1 Year (or when superseded)

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Testing Requirements

Required Testing

Please Note

It is the Department's expectation that all testing required in conjunction with tank handling activities should follow the manufacturer's guidance and/or an appropriate nationally recognized standard (for example: PEI RP 1200)

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Challenges

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Have You Seen One of These?

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How About One of These?

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Favorite Corrosion?

Same Location

1 Year from installation

Top-Right: E10 Tank top

Bottom-Left: Diesel Tank top

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Favorite Corrosion?

Same Sump: E-10
1/28/2016 and 9/8/2017

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Containment Sump Repairs

What standards exist for containment sump repair?

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Containment Sump Repairs

What standards exist for stopping water infiltration into a containment sump?

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Containment Sump Repairs

Are you able to provide manufacturer approval and documentation for your planned repairs?

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Containment Sump Repairs

Final Question: What do you think is happening at this site now?

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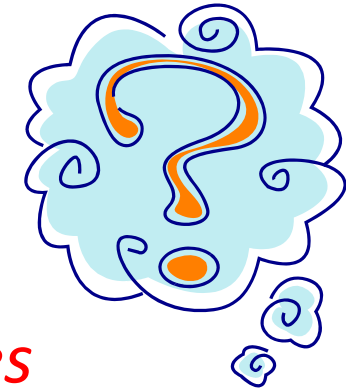
Modification or Maintenance?

- Not sure if the work to be performed is considered a Modification or Maintenance activity?
- DEP has an updated guidance document to assist in determining Modification versus Maintenance activities
- http://www.dep.pa.gov/
- Use the search bar and search for:

  Modification and Maintenance issues



- If still unsure, call DEP Technical Staff to clarify

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Minor/Major Mods and Maintenance

- Major Modifications
  - Activity to upgrade, repair, refurbish or restore an existing tank which:
    - Alters design
    - May affect integrity
    - Excavation required

- E.g.: Installation of CP system, piping replacement, sump replacement, breaking concrete

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Minor/Major Mods and Maintenance

- Minor Modifications
  - Activity to upgrade, repair, refurbish or restore an existing tank which:
    - Does not alters design
    - May affect integrity
    - No excavation required

- E.g.: Installation of a different kind of LLD, overfill prevention replacement, shear valves replacement, entry boots replacement, pulling new piping through chase

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Minor/Major Mods and Maintenance

- Maintenance
  - Normal operational upkeep
    - Does not alter design
    - Does not affect integrity
    - No excavation required

- E.g.: Replacing filters, CP testing, empty spill buckets/sumps, replacing dispenser parts above shear valve, replacing LLD with like devices when accessible from aboveground

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Modification & Maintenance Changes

- **Major Modifications**
  - Complete dispenser replacement with excavation, also requires under dispenser containment
- **Minor Modifications**
  - Replacement of dispenser without excavation (bolt off, bolt on)
  - Cathodic protection repairs that only involve rectifier replacement or reconnecting wires with no excavation
  - Repairs to primary or secondary containment, including installation/repair of sump entry fittings (no excavation)
- **Maintenance**
  - Adjustments to ICCP rectifiers (adjustments need to be evaluated/determined by a Corrosion Expert prior to the adjustment)

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Modifications: Corrosion Protection

- **25 Pa. Code § 245.421(1) Tanks & 245.421(2) Piping** indicate that 'Field-installed cathodic protection systems are designed by a corrosion expert.'
  - Corrosion Expert is defined in **245.1 Definitions**

CORROSION EXPERT - The Department's definition requires NACE certification unless the person is a registered professional engineer (P.E.) with certification or licensing that includes education and experience in corrosion control of buried or submerged metal piping systems and metal tanks.	**NACE CERTIFICATION**
	Corrosion Specialist
	Cathodic Protection Specialist
CATHODIC PROTECTION TESTER - The Department's definition of cathodic protection tester does not require any specific certification; however, it does require education and experience in various corrosion areas. Persons holding these NACE certification levels are viewed by the Department as fully meeting regulatory requirements.	Cathodic Protection Technologist
	Cathodic Protection Technician
	Cathodic Protection Tester
	Senior Corrosion Technologist
	Corrosion Technologist
	Corrosion Technician

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Modifications: Sti-P3® Upgrades/Repairs

- It is the Department's expectation that:
  1. A Department certified "UMX" will perform or be onsite to oversee any tank handling activity.
  2. Any tank handling activity should be performed in strict accordance with a recommended practice and/or site design.
  3. All tank handling activities should be properly documented to show compliance with Department requirements, recommended practices and the site specific design.
- While these are General Rules for Modifications to USTs, these rules ALL apply to the addition of Supplemental Anodes to a sti-P3®tank
  - The recommended practice and site design in these cases can be either a Corrosion's Expert's site specific design or STI R972 Recommended Practice for the Addition of Supplemental Anodes to sti-P3® USTs.
  - See the Department's CP Guidance for what is allowed in regard to Corrosion Protection repairs and upgrades.

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Documentation: Sti-P3® Upgrades/Repairs

- A Department certified “UMX” should include the following in the comments or supporting documents of modification reports for sti-P3® Upgrades/Repairs:
  - The standards and practices used to perform the upgrade/repair.
  - The results of any testing required to assess the site for the tank handling work.
  - The results of all Cathodic Protection surveys both before and after the work is completed.
  - The specific location, burial depth, type, and weight of all Anodes added to the tank system.
  - The name and contact information of the corrosion expert responsible for the site design.
- Certified tank handlers and their companies who fail to properly meet the requirements in 25 Pa. Code § 245 can be subject to enforcement.

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1 Year After Installation

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1 Year After Installation

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Dispenser Removal / Replacement

Dispenser Removal and Replacement

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Dispenser Removal / Replacement

Effective Nov. 10, 2007, dispenser containment is required:

- 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,
- Under an existing dispenser when a vertical riser, interconnected piping and fittings are replaced below the shear valve, involving a major modification (excavation takes place). See Technical Guidance No. 257-0900-011, “Storage Tank Modification and Maintenance Issues.”

Containment is not required on systems installed before Nov. 10, 2007. In a typical dispenser knock-down where the shear valve operates as designed, no piping is replaced below the shear valve and no excavation is involved, reinstalling or replacing the dispenser does not require installation of under dispenser containment.

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Dispenser Removal / Replacement

	30 day notice	UMR	UMX	Major Mod	Minor Mod	Sampling /Closure report	Meet New Regs
Remove Dispenser for TOS status (no excavation needed)			X		X		
Remove Dispenser (No Replacement Dispenser)	X	X			X	X	
Remove Dispenser / Replace Dispenser (No Excavation, No Change in Mounting hardware or brackets)			X		X		
Remove Dispenser / Replace with New Dispenser (Excavation, Change in Mounting hardware or brackets,)	X	X	X	X		X	X

Dispenser Removal / Replacement

Real World Example – Before Modification

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Dispenser Removal / Replacement

Before Modification

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Dispenser Removal / Replacement

After Modification

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Dispenser Removal / Replacement

New dispenser frame, piping and concrete under dispenser – Not Minor

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Dispenser Removal / Replacement

Compliant with current regulations?

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Attempting to Circumvent the Regulations

Owner/Operator Decides that Islands need to be replaced, but as long as the dispensers are not touched no UMX is needed and no UDCs need be installed.

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Attempting to Circumvent the Regulations

1. No UMX will sign off on work
2. Product lines are now leaking
3. Final Resolution: UMX hired to remove everything and start over.

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Proper placement of overfill alarm?

Be Mindful of Water Infiltration

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Attention to Detail

Tank Historically Marked as ACT-100 by IUM:

- Facility hires new IUM who checks CP as first step to determine tank construction:
  - Simple Owner Interview results in installation pictures showing STi-P3 tank.
- Certified Inspector's negligence caused a generally proactive owner to have numerous areas of non-compliance because of historical failure to accurately report tank construction and system configuration. Owner had all necessary documentation available for review.

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Impromptu Hydrostatic test?

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Snap Tap Connectors

Do you see these?

Do you feel there are any problems with this?

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TLS-Cadillac

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Facility Operations Inspection Report Completion

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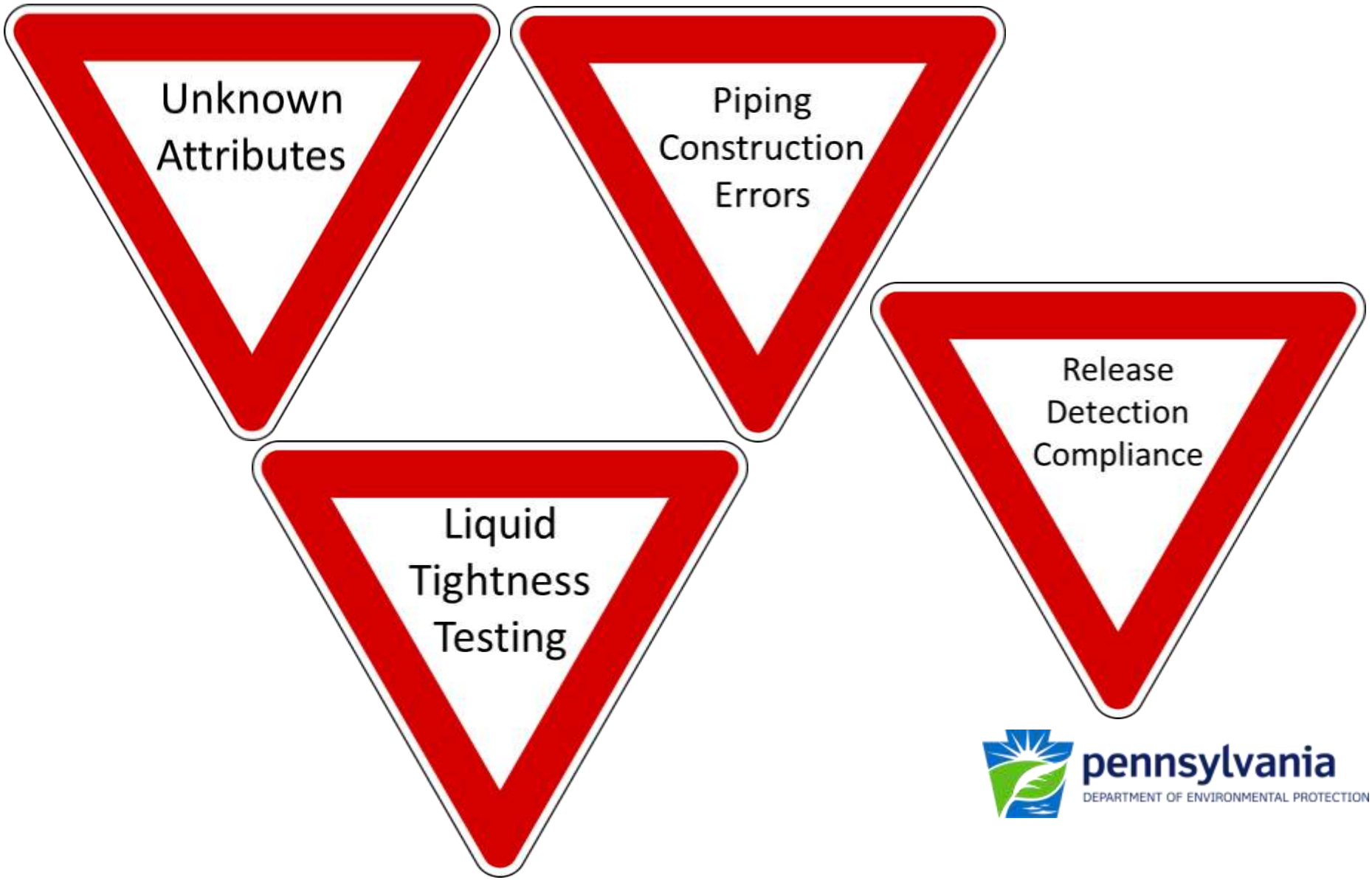
High Frequency Errors



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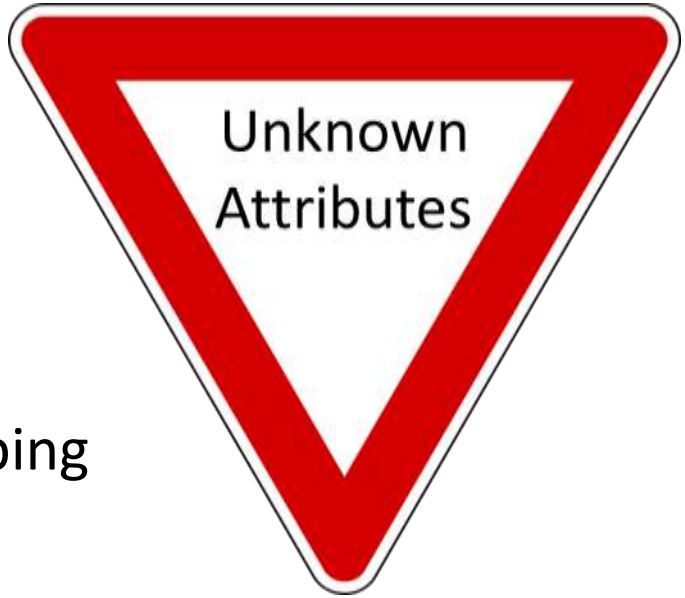
Unknown Attributes

No Exceptions:

- If tank construction is unknown, the tank is considered Noncompliant.
- If piping construction, piping flex or piping connector is unknown, the piping is considered Noncompliant.



The facility is REQUIRED to maintain records of construction and modification. If you are unable to observe physically or confirm from construction documentation what the status of the tanks and piping are this should be detailed on Page 7 in the comments!

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Unknown Attributes

Observe Site

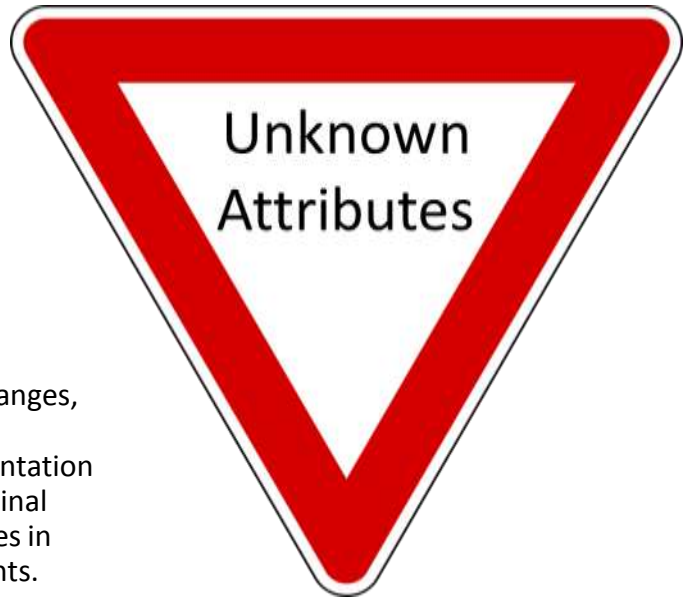
- Record Observable Attributes

Review Construction Documentation

- Note changes, missing documentation and original attributes in comments.

Follow-up with Owner and/or Installer

- Attributes that remain Unknown are Noncompliant



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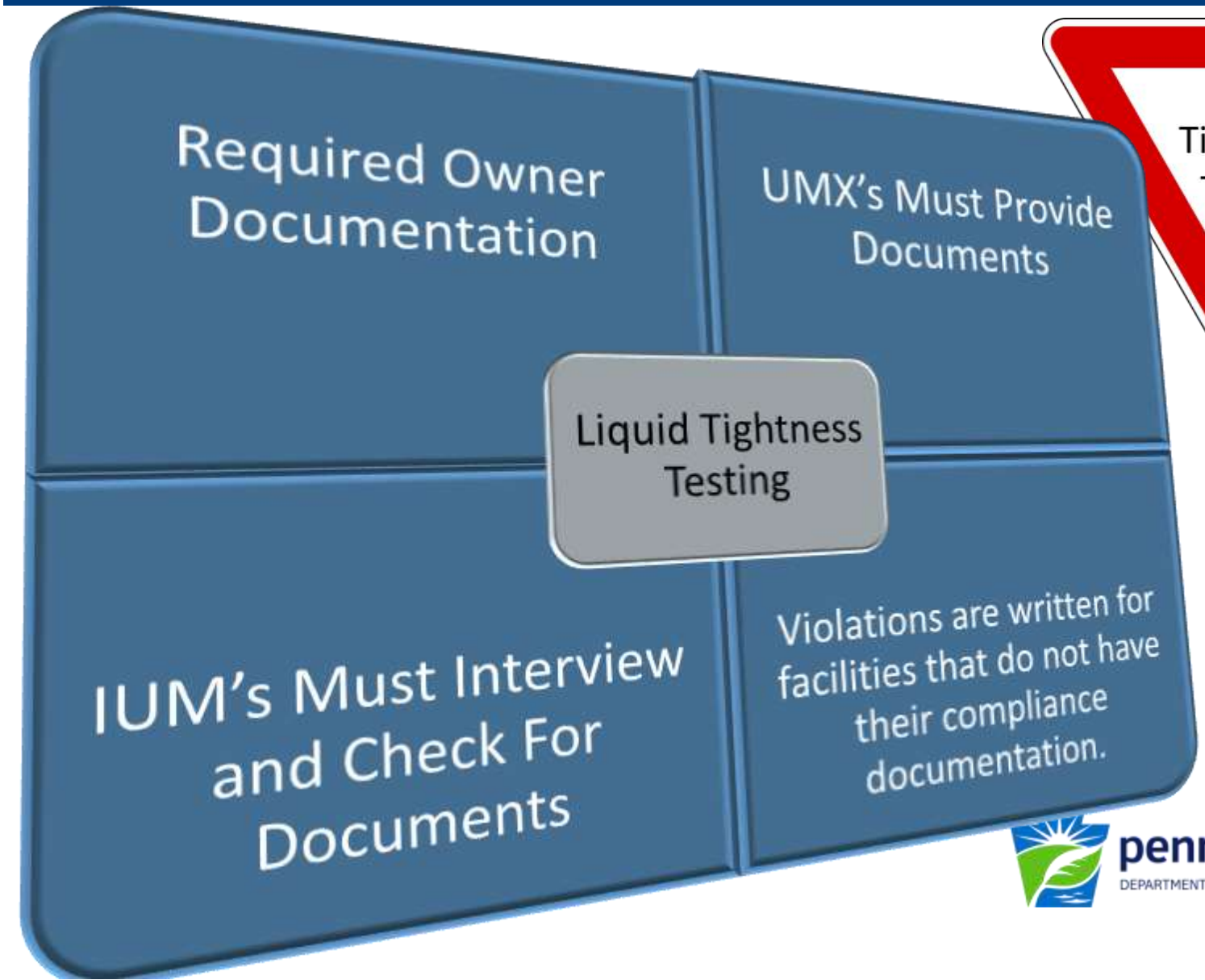
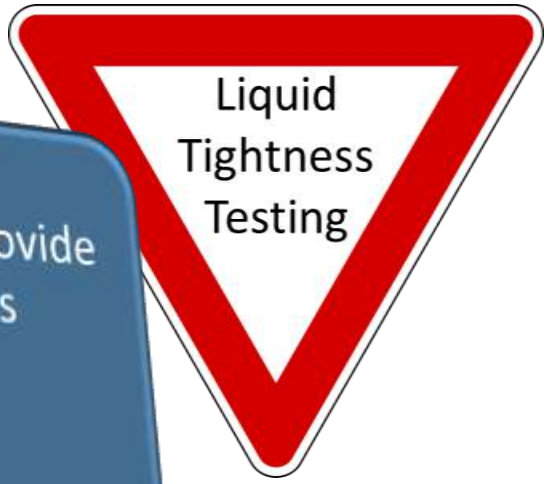
Liquid Tightness Testing





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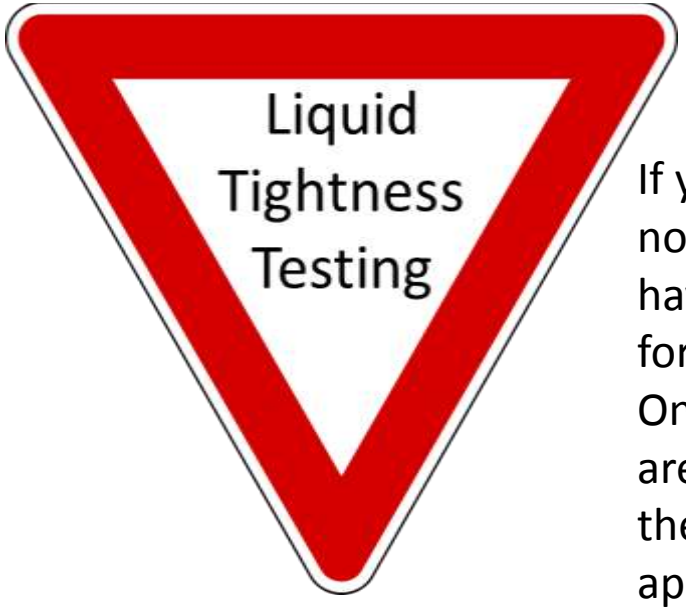
Liquid Tightness Testing: Sample Form

Comments: Provide essential details in the report comment section (V on page 7). The minimum areas to comment on are: suspected contamination; improperly closed or unregistered tanks; "other" tank system attributes; tank system modifications (with date); estimated installation date when actual date is unknown; date when product was first deposited in the tank; periods when tank was empty (contained 1" or less of product); release detection exemptions, missing months and months with failures or inconclusives; description of suspected release investigations; owner/operator actions needed for compliance; changes at site, that would affect compliance, since initial inspection (with date); explanation of form entries marked "N/A"; recommendations made to owner/operator; description of technical assistance given to the owner/operator; date(s) of last containment test and other information that would be helpful to the owner, operator or DEP when reviewing the inspection. Include modifications and repairs to the tank system and the date(s) they were performed. List mailing addresses for the owner and/or operator when different from the facility address. Supply additional detail as appropriate. Use as many comment sheets as necessary. An example continuation page can be found on the Storage Tank website. The inspector must record the results of his/her water checks.



Note:

Modification Reports provided by the owner/operator should be listed with dates.

If you ask for Modification Reports, list ones received, and do not get ones that trigger Liquid Tightness Testing then you have good reason to not have listed Liquid Tightness Testing for that tank.

On the other hand, if the IUM fails to comment on minimum areas expected. In particular when owner/operators provide the documents to regional staff on follow-up. How does this appear to the department?

Let’s take a 10 minute break!

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Piping Construction

Quick Notes:

- Review your FOI Instructions.
- The Piping Flexible Joints/Connectors includes all forms of connectors at the end of piping not just stainless steel flexible connectors.
- Supply & Return Lines are to be marked as B – this is specifically detailed in the FOI Instructions.
- All piping configurations that include more than 1 type of piping should have lengths, transitions and clear descriptions included in comments and with the site diagram.
- **See Item 1:** This is all covered with detail in the FOI Instructions.
- Accurate descriptions of the piping are expected by the Department when you sign a UST FOI form as 'true, accurate and complete.'

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Piping Flexible Joints/Connectors

- Piping connectors can be flexible or rigid, and metallic or non-metallic.
- Code X, No Connector, should only be used when no piping connectors are present.
  - Lollipop systems (vertical drops from dispensing unit into the tank)
- Code 99, Other, must be explained in detail in the comments section on pg. 7.
  - FRP Elbows (include description and source of information in comments)

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Release Detection Compliance

Quick Notes:

- Review your FOI Instructions.
- Review your FOI Guidance.
- Any missing, invalid or failing Release Detection results should be marked noncompliant.
- Comments should specifically detail which months are not passing and any suspected release investigations in response to those results.
- From the FOI Instructions:
  - For a UST to be considered compliant with release detection, each block for the applicable method must be either checked or marked “N/A,” including the recordkeeping subsection on page 5. Each “N/A” must be adequately explained in the comment section.

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FOI: Basic Expectations

- FOI Forms should be complete and accurate.
- The FOI should be signed by the IUM and facility representative.
- The FOI arrives at the DEP within 60 days.
  - Not 2 months. Not postmarked on the 60th day.
  - If it will be late, please pick up the phone and let us know.
- **Request:** If you inspect a facility **AFTER** the inspection due date on the Registration Certificate, call Central Office and report that the FOI was done.

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FOI: Basic Expectations

- Instructions and Guidelines for completing FOIs are available on the website:
  - **Document Number:** 263-3120-003 **Title:** Guidelines for Conducting Underground Storage Tank (UST) Facility Operations Inspections (FOI)
  - **Document Number:** 2630-FM-BECB0501 **Title:** Underground Storage Tank Facility Operations Inspection Report Form Instructions
- Complete Physical Inspections & Complete Paperwork Inspections
  - IUM **should** review the paperwork required for compliance with the facility representative.
    - **Ask Questions** to determine what the facility representative should be giving you. Did they replace Spill Containment, Sumps, Dispensers?
    - There is **MORE** to paperwork than Release Detection documents.
    - A suggestion is to list specifically the paperwork provided in comments.

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FOI: Compliance Determinations

- Compliance is based on the conditions upon arrival at the site.
- Compliant items should have ALL appropriate checkboxes checked on Pages 3 to 6.
- Noncompliant items and any N/As should have clear comments on Page 7.
- Attributes (on Page 2) marked as “Unknown” are NOT Compliant.
  - Comments should explain why it is unknown.
- Attributes & Associated Compliance determinations **SHOULD NOT** depend on previous FOI reports.
  - IUMs include comments frequently indicating that this is how they have determined compliance. This can lead to enforcement against you and your company.

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Comments: Water in Tanks

- **<u>Recording the water level from the ATG monitor is not acceptable</u>**.
  - Many ATG water floats do not detect phase separation layers.
  - Some ATGs do not indicate any presence of water in the tank until more than 1” is present.
  - Dirt and residue in the bottom of tank can lead to false water level readings.

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Site Drawings or Comments

- Site Drawings are suggested by the Department
- Certain items are expected to either be included in a site drawing or explained in the comments:
  - Location of Overfill Alarms
  - Sensor placement (in particular when not in all sumps/pans)
  - Compartmented Tanks
  - Any manifolded tank configurations other than standard Drone/Master configuration
  - Unique Piping configurations to include lengths and types
  - Tanks with both New and Old Piping

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Every Site is Unique!

If it is Unique, Put it in the comments!

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Acceptable Usage of Vent Piping?

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Weather Trouble?

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Weather Trouble?

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Comments: Bravo Boxes @ Dispensers

Shallow Style Bravo Boxes

- Shallow bravo boxes should be noted in comments.
- If the shallow bravo boxes do not contain the entire piping connector, it should not be marked as attribute code I.
- The piping construction outside of the Bravo box should be documented:
  - Unknown = Noncompliant.
- Release Detection Compliance:
  - If the piping is **NOT** completely double wall:
    - Interstitial Monitoring is not a valid form of piping release detection.

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Pressurized / Pumped Delivery Issues

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Pressurized / Pumped Delivery

In order to comply with 34 PA Code, Chapter 14a, all deliveries of flammable or combustible liquids must be done through liquid tight and vapor tight fills. Loose fills are not permitted.

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Pressurized / Pumped Delivery

Ball floats should not be installed in storage tanks that receive pressurized or pumped product deliveries.

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Pressurized / Pumped Delivery

Most small USTs receive pressurized or pumped product deliveries (tank capacity less than 2,500 gallons).

Regardless of tank capacity, tanks that receive pressurized/pumped deliveries are non-compliant for overfill prevention if the only installed equipment is not compatible with that delivery method.

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Pressurized / Pumped Delivery

Solutions –

1. Have an overfill alarm installed.
2. Have a drop tube shut-off device that is designed for use with pressurized deliveries installed.
3. Have an “official contract” signed by both the tank owner and delivery company that states the storage tank will only be filled via gravity drop. (…if the delivery company changes, a new contract must be signed…).

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FOI: Emergency Procedures and Operators

- **25 Pa. Code § 245.436(a)(1) states,** "An owner shall designate Class A, Class B and Class C operators for each underground storage tank system or facility that has underground storage tanks permitted to operate by the Department."
  - Every Facility must have at least 1 of each type of operator.
  - There should be a list of designated operators.
    - Name, Operator Class, Date of Training, Date of Refresher, and Phone Number (unmanned and Class A/B not permanently onsite)
- All sites should have **valid** Emergency Procedures.
  - Posted in view of dispensers for unmanned sites
  - Available to Class C Operators
    - Class C Operators should know where they are!

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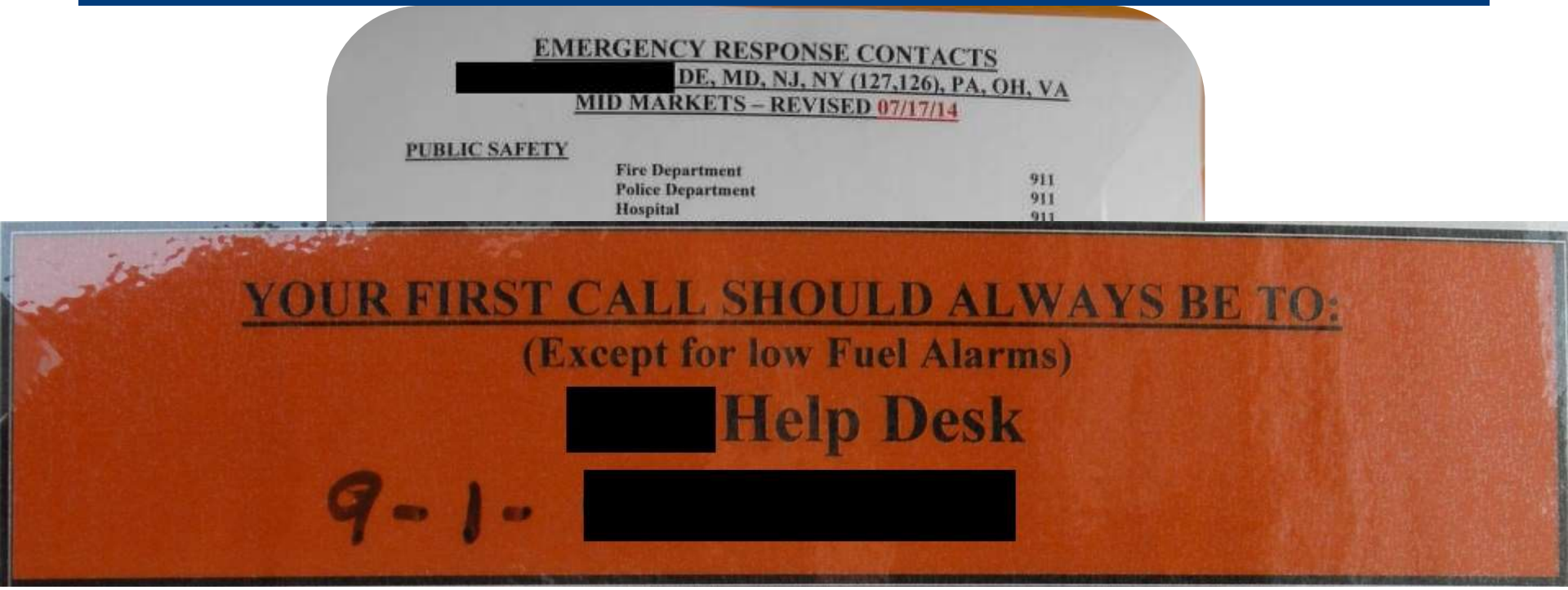
FOI: Emergency Procedures



What Do You Think Happened When the Department Called This Number?

If you guessed that:

- We were told it was the wrong number.
- The individual on the other end was unable to provide the appropriate contact information.

You would be correct!

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Kerosene Fills

Please See:

Combustible and Flammable Liquids Act
Act 1998-15

Section 7(a): Retail Service stations.

Labor & Industry requirement

Fire hazard safety measure that is intended to prevent the delivery of other fuels into kerosene tanks.

Applies to kerosene tanks at retail facilities.

Most retail gasoline and diesel fills are 4 inches; therefore, the kerosene fill must be smaller than 4 inches and also must be a tight fill.

Be mindful of the delivery method and the overfill prevention device!

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Comments: Piping Deterioration

- Deteriorating Piping should be noted in the comments of an FOI.
- The piping should be marked Non-Compliant on Page 1.

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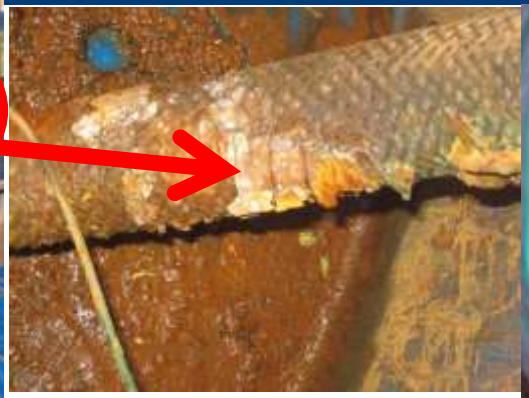
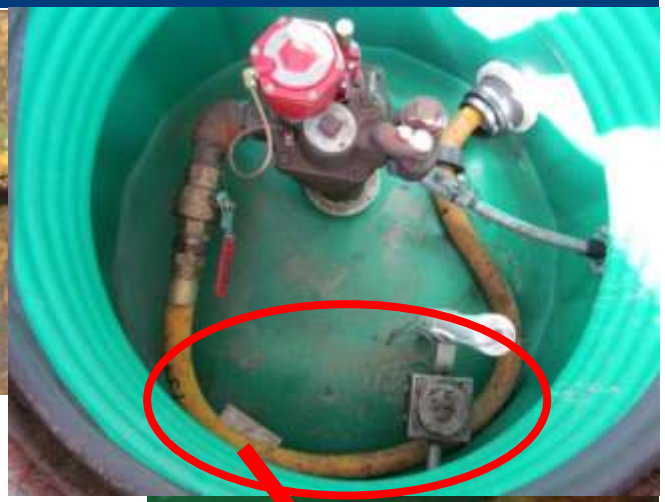
Piping Deterioration: Total Containment Piping





- Total Containment Piping needs to be noted in the comment section of the FOI.
- DEP Technical Staff would like to assess all instances of Total Containment Piping.
- If it is deteriorating it must also be called Non-Compliant for piping construction on Page 1.

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Piping Deterioration

- Piping requires careful inspection.
- Sumps should be inspected from multiple angles.

Pictures should be reviewed back in the office for missed items.

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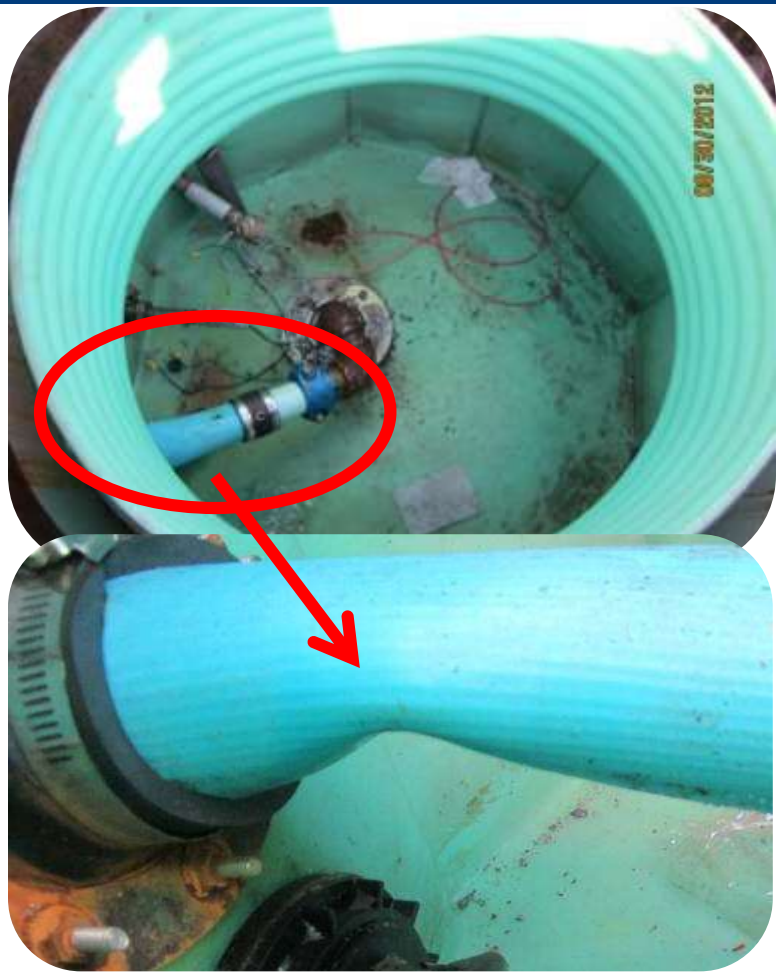
Piping Deterioration



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Comments: Containment Sumps

- Containment Sumps and Pans
  - From FOI Instructions: Underground tank system sumps must be maintained clean, free from water intrusion, dry and in good repair.

- Comments should include:
  - Condition (intact, stained, etc.)
  - How much water, if any?
  - Is water in contact with piping and other metal fittings?
    - Yes = Noncompliant Piping
  - Where is water infiltration coming from?
  - Sumps should be dried and cleaned immediately.

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Maintenance Violations

- Please check to make sure that sumps and spill buckets are clean!

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How Would You Describe These?

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1 Year Old Install Series

- Any ideas why this piping is kinked?
- Should properly installed entry boots fail in less than a year?
- Are you familiar with the Dri-Sump testing method? Will it work with this back fill?

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Comments: Containment Sumps

- Containment Sumps, Pans, and Spill Buckets
  - If installed after 11/10/2007 these require Liquid Tightness Testing.
  - The owner is required to maintain copies of the most recent test with their compliance documents.
  - The Department receives many FOIs that mark no liquid tightness documentation and there are no comments:
    - Always include comments when documentation is missing **AND** cover required documentation with the facility operator as part of your compliance review/assistance.

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Comments: Release Detection

- Tank Release Detection
  - The Department requires monthly monitoring of Tanks.
    - 12 Passing Months should be available.
    - Missing, Invalid, and Failing months should be clearly detailed in the comments section.
    - Changes and Multiple forms of Release Detection should be clearly explained in the comments.
- Piping Release Detection
  - Reminder: Compliance is based on arrival at the site!
    - Dates on Page 5 should reflect the last test conducted prior to your arrival.
    - If testing is conducted concurrent with your FOI these results should be included in the comments section.
  - Monthly Monitoring should be recorded in comments in the same manner as Tank Release Detection.
- Invalid and Failing Release Detection
  - Triggers a suspected release investigation within 7 days. Results should be included in comments.

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Release Detection?

Page 15 from FOI Guidance:
The inspector should ask the facility representative to show the inspector the equipment being used for release detection and explain/ show/demonstrate its use.

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Continuous Interstitial Monitoring

- Sensors used for 3.0 gph (LLD Function) must be tested annually.
- Sensors used for Positive STP shutoff must be tested annually.
  - When used for the continuous 3.0 gph release detection (LLD) method.
  - When used to meet the positive STP shutoff requirement for new pressurized piping.
    - NOTE: Individual Dispenser Shutdown does NOT meet this requirement

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Piping Release Detection: Common Errors

- Piping installed after 11/10/2007:
  - Pressurized System: missing Positive STP Shutdown
  - Suction Systems:
    - Marked as Exempt from Release Detection
    - Not evaluated for Interstitial Monitoring or Total Secondary Containment.
- Piping using Continuous Interstitial Monitoring without sensors in all Sumps and Pans:
  - Box checked on Page 4: 'capable of detecting 3.0 gph release within 1 hour'
    - When Department questions the configuration the IUM is either not confident in previous assessment or the physical configuration clearly does not meet the standards.
    - Example on next slide

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Example: Continuous Interstitial Monitoring

<u>Question?</u> Does a 3 gallon per hour leak trigger STP Shutdown within 1 hour?

<u>Scenario:</u>

1. Site is required to use interstitial monitoring.
2. Site uses continuous interstitial monitoring for positive turbine shutdown.
3. 1 STP sump and 2 Dispenser sumps. 1 sensor in STP sump. No sensors in Dispenser sumps.
4. Piping penetrations are 7-8” above bottom of the dispenser sumps.
5. All boots are tight and jumpers are being used.

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Sensor Hall of Fame

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Release Detection: Summary Printouts

- Facility Info
- Operational Compliance
  - Cathodic Protection
  - Release Detection Setup
  - Release Detection Summary
  - ATG/CSLD
  - Interstitial Monitoring
  - Alarms
  - Sensors
  - Deliveries
  - Inventory
- Activities
- Electronic Files
- Maintenance/Environmental
- E-Processing
- Regulatory

Release Detection Summary

Month/Year: January 2015

ATG Monthly Results from February 2014 to January 2015

Tank #	Capacity	Contents	Release Detection Methods	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan
1	7,841	Premium	Interstitial, ATG	-	-	P	P	P	P	P	P	P	P	P	P
2	7,841	Regular	Interstitial, ATG	-	-	P	-	P	-	-	-	-	-	-	-
3	7,841	Regular	Interstitial, ATG	-	-	P	-	P	-	-	-	-	-	-	-

P-Pass, F-Fail, I-Inconclusive, Q-In Queue, R-Received, (-)-No Result Available

Interstitial Monthly Results from February 2014 to January 2015

Tank #	Capacity	Contents	Release Detection Methods	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan
1	7,841	Premium	Interstitial, ATG	-	-	P	P	P	P	P	P	P	P	P	P
2	7,841	Regular	Interstitial, ATG	-	-	P	P	P	P	P	P	P	P	P	P
3	7,841	Regular	Interstitial, ATG	-	-	P	P	P	P	P	P	P	P	P	P

P-Pass, F-Fail, I-Inconclusive, Q-In Queue, R-Received, (-)-No Result Available

Release Detection: Summary Printouts

The Department will typically accept summary printouts:

- Summary Printouts can be easily changed; therefore, IUMs should verify results with ATG History print outs.
- The Department reserves the right to request original ATG print outs from the 3rd Party Approved Equipment.

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Release Detection: CSLD/SCALD Issues

- SCALD and CSLD Reports will have 2 or more dates:
  - Date of Printing
  - Date of Passing Test
    - Passing Test dates can be significantly older than the date the report was printed. Ensure that you check the passing test date for each tank, each month!
    - Northeast Region identified a SCALD report that each month reported a passing test; however, the test was from September 2013

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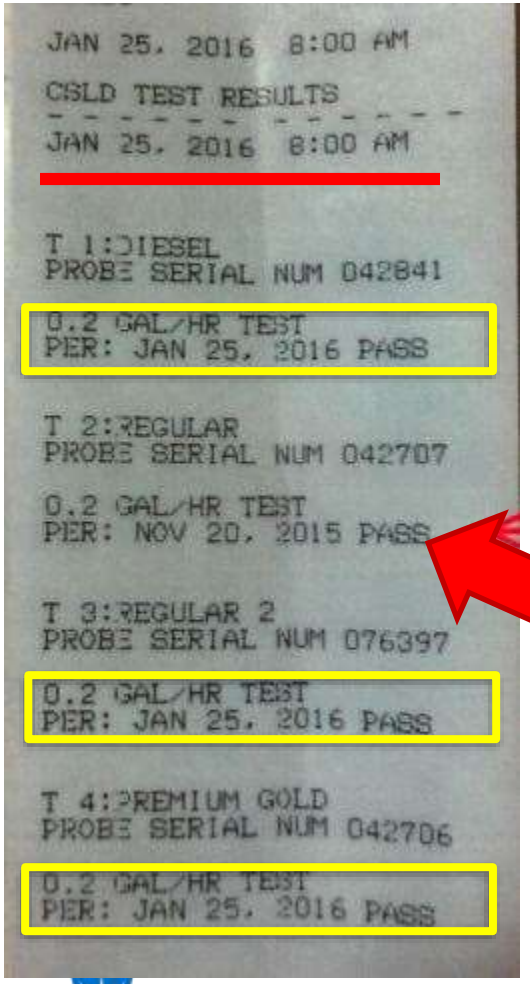
Release Detection: CSLD Dates

- CSLD Example:
  - Print Date
  - T1, T3, & T4 Test Dates
    - All Good, Completed Day of Printout
  - T2:
    - NOV 20, 2015 PASS
    - 66 Days Ago



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Release Detection: SCALD Dates

- Sample SCALD Report:
  - Print Date
  - Test Date
  - Test Result

INCON
INTELLIGENT CONTROLS INC
P. O. BOX 638
SACO ME 04072
1-800-984-6266

08/13/1998 9:56 AM

SCALD TEST REPORT

TANK 1 11882.3 GAL
UNLD REG

LEAK TEST	0.200 GPH
LEAK THRESHOLD	0.100 GPH
EXTENT	18.0 HRS
VOL QUALIFY	0.0%
TEST STARTED	12:22 PM
TEST STARTED	08/07/1998
SALES RATE	54.731 GPH
EVAPORATED	1.781 GAL
LOST	0.327 GAL
DUTY FACTOR	0.31
UPDATED	12:40 AM
UPDATED	08/10/1998
SLOPE	-0.002 GAL/HR
TEST RESULT	PASSED

SLOPE EQUALS CALCULATED LEAK RATE

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Release Detection: CSLD/SCALD Issues

- Cause of Error:
  - The CSLD functions by collecting data while product is NOT being dispensed from the tank. While product is being dispensed the CSLD cannot collect data. When a tank is having a constant release, the CSLD mistakenly recognizes this as product being dispensed.
  - Solutions:
    - Familiarize with the other methods of recognizing leaks.
      - Review CSLD/SCALD Troubleshooting guides from the manufacturers.
      - Train your facility operators during inspections.
    - VR ATGs may be able to install a Pump Sense module to differentiate between product dispensing and a constant release.

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Showed Rust & a Little Flaking during Inspection

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I wonder how many others are out there…

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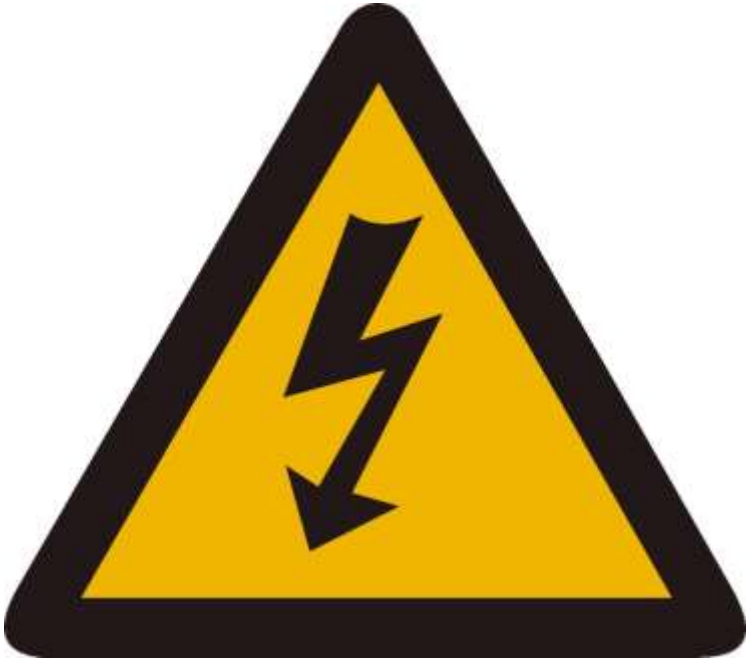
Cathodic Protection Issues and Reminders



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Compliance: Corrosion Protection

- Required Documentation:
  - Both Galvanic and ICCP Require:
    - 2 CP Surveys
      - 1 on the day of FOI and 1 within the past 3 years.
      - 1 within the past 3 years and one within 3 years of that survey.
    - Modification Reports and Supporting Documentation for any upgrades or repairs
      - Ensure all Field Installed CP Systems have both Tank Shell Assessment and Corrosion Expert's design documentations.
      - FOI and Corrosion Protection Guidance detail the steps required to resolve compliance at sites who have failed to maintain historical documentation.
        - » These documents are available on the website and the back table

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Compliance: Corrosion Protection

- Required Documentation:
  - ICCP Requires:
    - Rectifier readings
      - 3 Required:
        - » Current Reading (Within 60 Days)
        - » Current Reading – 60 Days
        - » Current Reading – 120 Days
    - Corrosion Expert's Design and System Limitations documentation.

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FOI: Corrosion Protection Sections

Galvanic and Impressed Cathodic Protection: (Tank code B, C, O or P and/or Piping)

☐ ☐ ☐ ☐ ☐ **tank** structure to soil potential greater than 0.85 volts, **or**
☐ ☐ ☐ ☐ ☐ meets other nationally recognized protection standard: specify: _____

____ ____ ____ ____ ____ potential on **tank** current monitoring (date) 02/19/2016

____ ____ ____ ____ ____ potential on **tank** previously monitored (date) 02/24/2013

☐ ☐ ☐ ☐ ☐ **pipe/flex** structure to soil potential greater than 0.85 volts, **or**
☐ ☐ ☐ ☐ ☐ meets other nationally recognized protection standard: specify: _____

____ ____ ____ ____ ____ potential on **pipe/flex** current monitoring (date) _____

____ ____ ____ ____ ____ potential on **pipe/flex** previously monitored (date) _____

Impressed Current Design and Rectifier Output: (Tank code C or P and/or Piping)

☐ ☐ ☐ ☐ ☐ system designed by a corrosion expert
☐ ☐ ☐ ☐ ☐ system is turned on and functioning within design limits
☐ ☐ ☐ ☐ ☐ documentation of last three amp (plus volt and runtime when meters available) readings, recorded at least once every 60 days:

most recent:	volts: _____	amps: _____	runtime: _____	date: _____
60 days prior:	volts: _____	amps: _____	runtime: _____	date: _____
120 days prior:	volts: _____	amps: _____	runtime: _____	date: _____

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: _____

Tank Shell Assessment Method: _____

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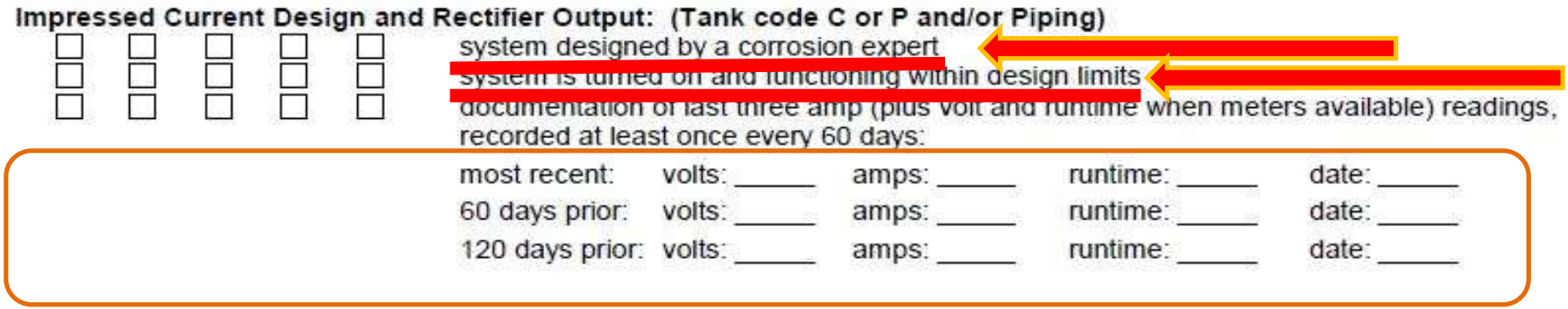
FOI: ICCP Design and Rectifier Output



Review: Checkbox Meaning

1. 'System Designed by a Corrosion Expert'
   - How is this being assessed?
   - How should it be assessed?
2. 'System is turned on and functioning within design limits'
   - Per FOI Guidance (PG 14): 'If limitations are not available, variations of ±10% from the initial readings should be investigated by a corrosion expert.'
3. Document Last 3 Rectifier Readings
   - Every 60 Days
   - Available Items from Volts, Amps, and Runtime

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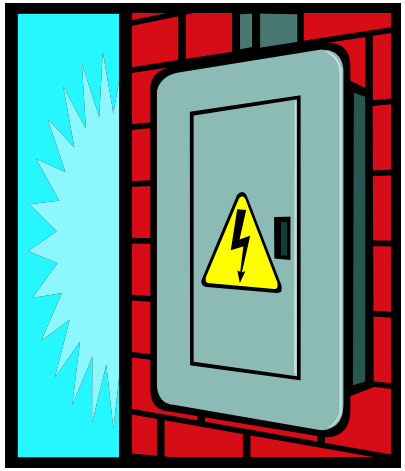
Cathodic Protection Documentation

- On October 3rd of 2015, the Department published:
  - 263-4200-002 Guidelines for the Evaluation of Underground Storage Tank Cathodic Protection Systems
  - 2630-FM-BECB0610 UST Cathodic Protection System Evaluation Form

From the Guidelines Introduction:

The primary purpose of this document is to provide general guidelines regarding the evaluation of cathodic protection systems operating on underground storage tank (UST) systems in the Commonwealth of Pennsylvania …This guidance is also intended to establish what minimum documentation should be generated by a cathodic protection tester in order to conduct a valid cathodic protection evaluation and be able to reproduce the test results.



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Cathodic Protection Documentation

- **SECTION 8 - CATHODIC PROTECTION EVALUATION DOCUMENTATION**
  - Cathodic Protection surveys prepared by IUMs and other Cathodic Protection documents reviewed during inspections should be reviewed with consideration of the following items:
    - Site Drawing
      - Reference electrode placement for each reading.
      - Placement of each Anode in ICCP Systems and Field-installed Galvanic Systems.
      - Locations of all other relevant items that the Cathodic Protection tester can identify.
    - Test Results
      - Every Cathodic Protection Survey should clearly indicate whether the survey results in a Pass, Fail, or Inconclusive for the facility. The survey documentation is NOT valid for compliance without this information.

Release Reporting

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What Goes Where?

	Regional	Central
FOI	X	X
Lining Inspection	X	X
Mod Report	X	X
30 day Closure Notice	X	
Closure Report	X	
Contamination / Release Reporting	X	X
All Registration Documents (Long & Short)		X
Amended Registration (1 Page)	X	X
Closure/Removal Registration	X	X
TOS Extension Request Letters		X

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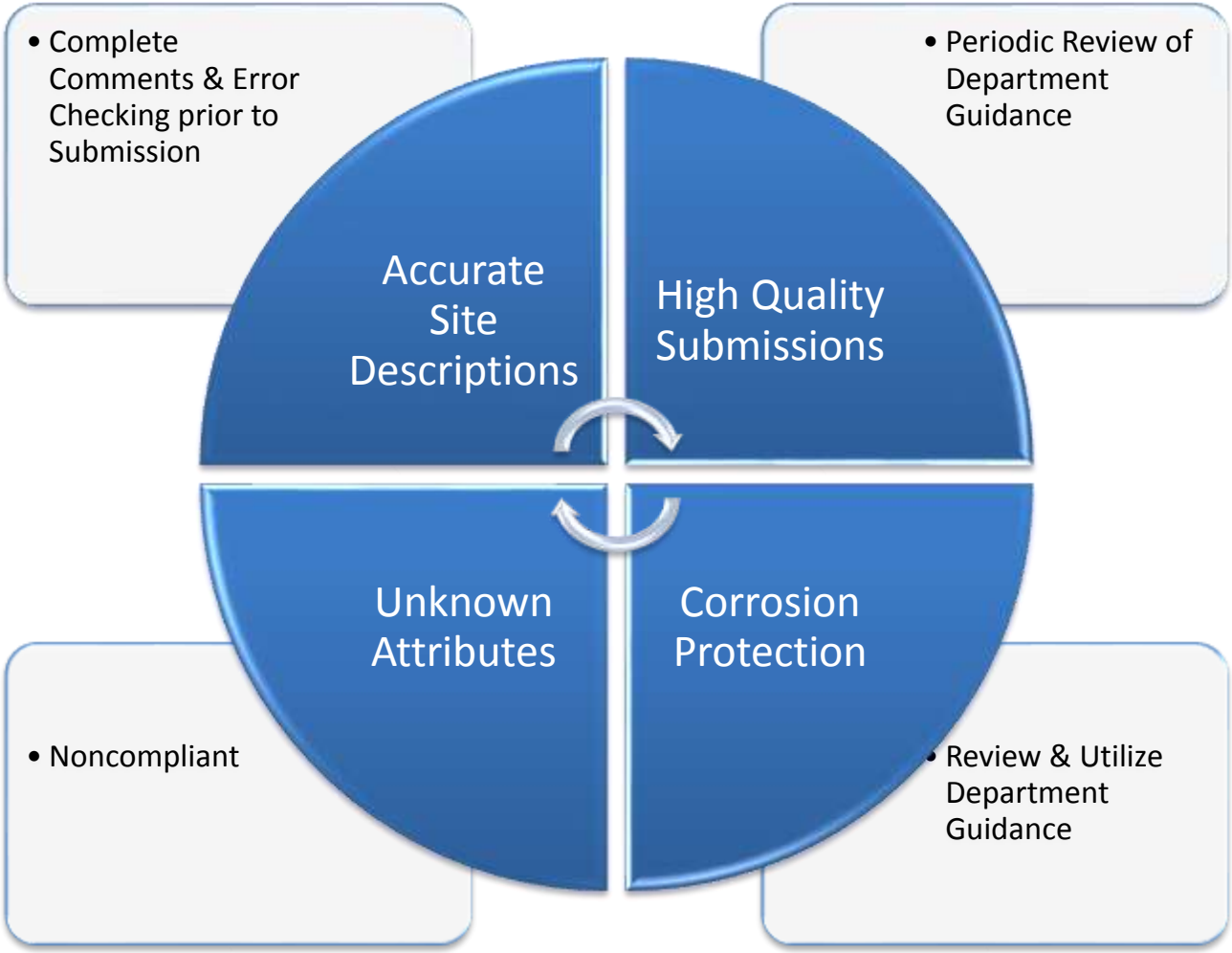
Conclusion



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Updated Storage Tanks Search

http://www.dep.pa.gov/Business/Land/Tanks/Registration/Pages/Regulated-Tank-List.aspx

Information on registered storage tanks is available in several formats for online access or downloading:

- **Active storage tank search**: recently **upgraded** with the ability to **display tank system components such as tank type, piping type, release detection methods**
- A **new Inactive Storage Tank Search** was built to return data on tanks that have been closed, removed, exempted, or otherwise removed from registration. This information should be of use to those performing property investigations and environmental assessments
- Storage tank inventory (divided by DEP region) is available to download via Excel spreadsheets

Information is derived from DEP's eFACTS (Environment, Facility, Application, Compliance Tracking System) database.

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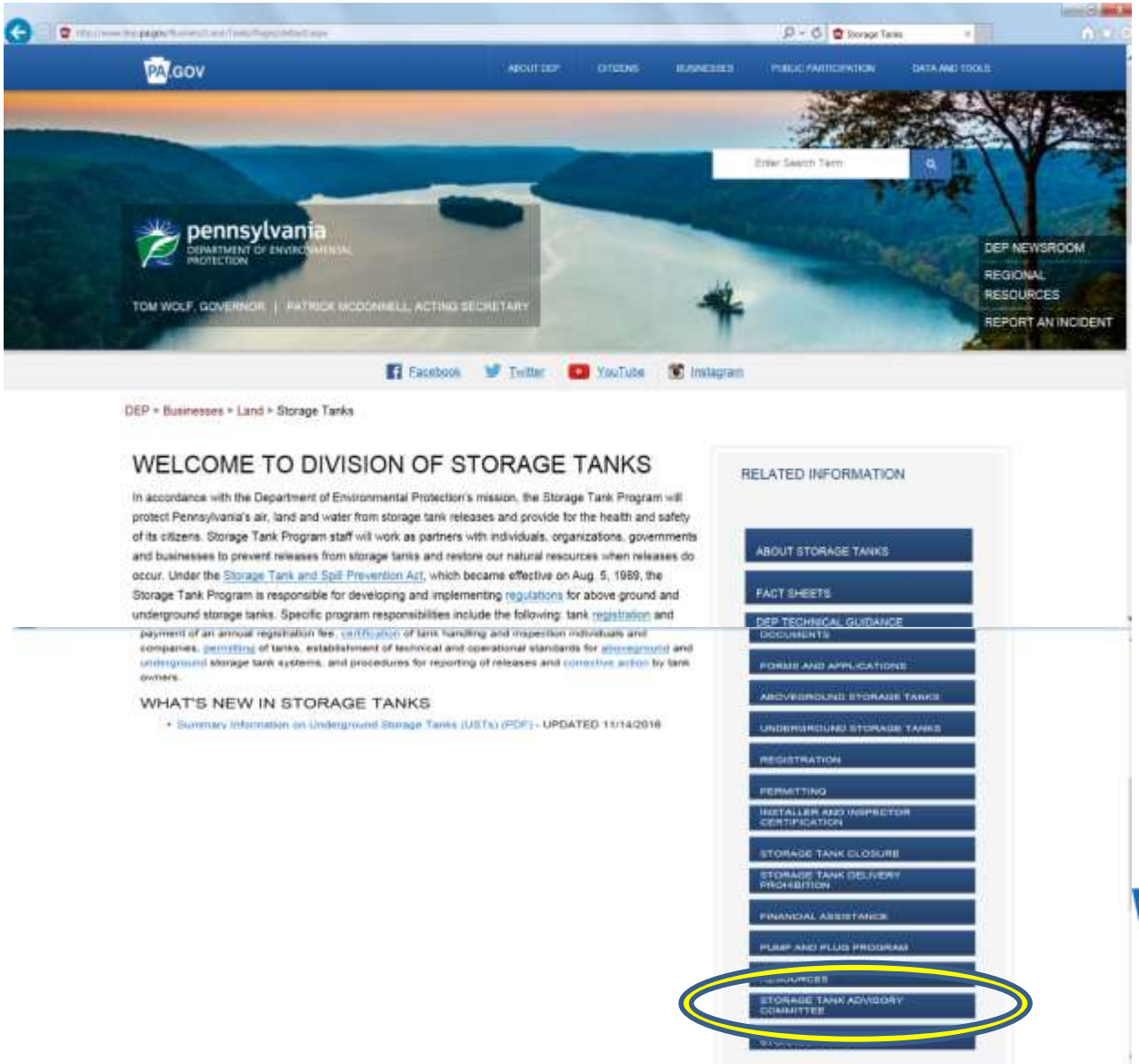
Notes on Upcoming Regulations



From the Storage Tank Homepage, scroll down until you see “Storage Tank Advisory Committee” in the blue box on the right side of the page

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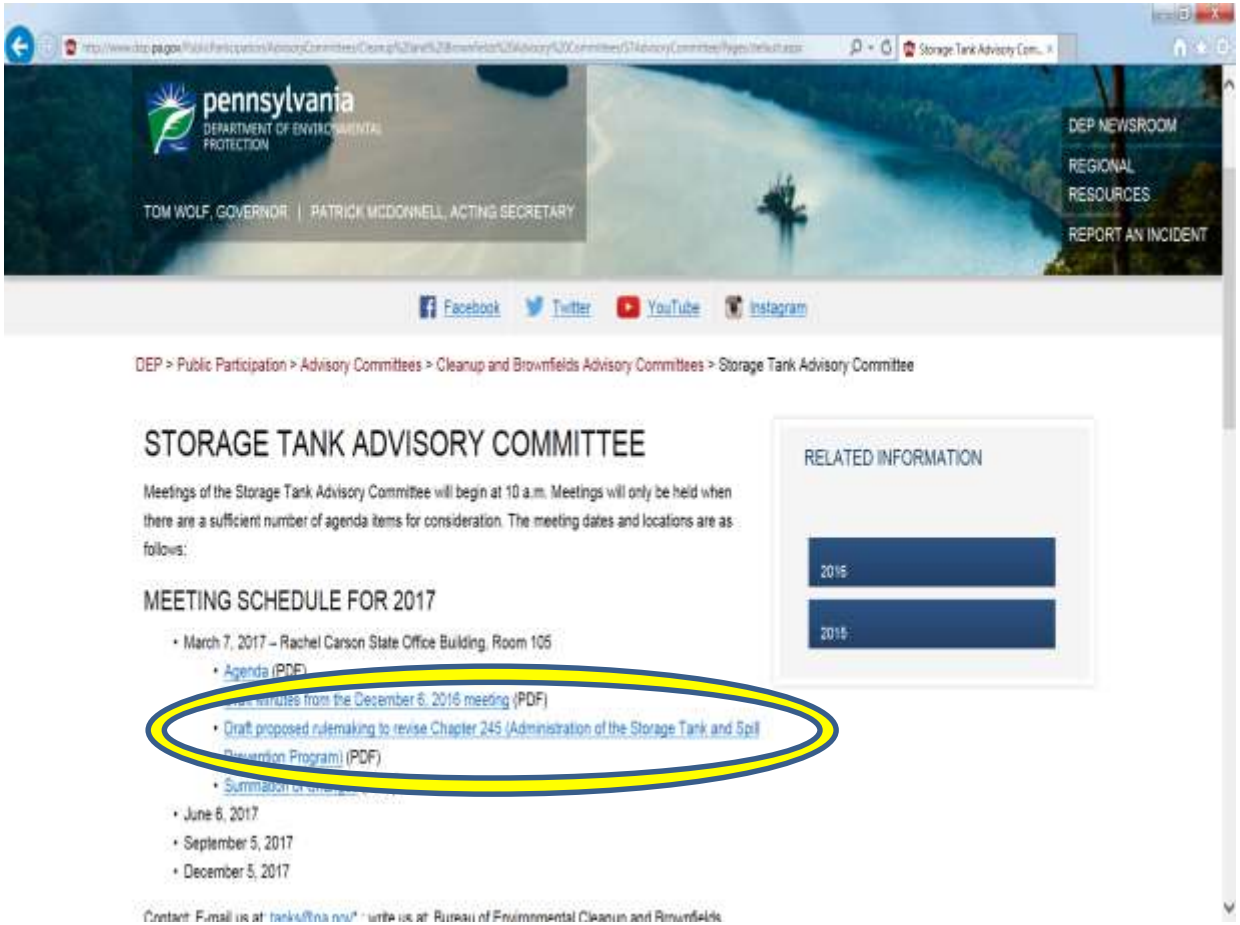
Notes on Upcoming Regulations



Under March 7, 2017, there is a bullet titled "Draft proposed rulemaking to revise Chapter 245 (Administration of the Storage Tank and Spill Prevention Program)." This is the most current rulemaking proposal.

The public comment period should begin in the next few weeks. Keep an eye out for an email from DEP.

We are striving for the revised regulations to be effective in early 2019.

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Report Submittal Emails

- Central Office: tanks@pa.gov
- Region 1 (SE): ra-serotanks@pa.gov

  Modification Reports must be mailed.
- 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

Individual emails must be < 10 MB total

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DEP Regional Emergency Response Phone Numbers

North West Region – 1-800-373-3398

South West Region – 412-442-4000

North Central Region – 570-327-3636

South Central Region – 1-866-825-0208

North East Region – 570-826-2511

South East Region – 484-250-5900


Questions?

Kris Shiffer – 717-772-5809 – kshiffer@pa.gov
Randy Martin – 717-772-5828 – ramartin@pa.gov
Alex Eckman (AST) – 717-772-5827 – eeckman@pa.gov
Alex Hess (AST) – 717-783-9767 – alhess@pa.gov
Josh Blanco (UST) – 717-772-5804 – jblanco@pa.gov
Pat Sosik (UST) – 717-772-5803 – psosik@pa.gov
Salma Chowdhury – 717-772-5821 – schowdhury@pa.gov

Eric Lingle – 717-783-2403 – elingle@pa.gov
Anne Toth – 717-772-5808 – anntoth@pa.gov
Wendy Davis – 717-772-5829 – wendavis@pa.gov