

COMPLIANCE ASSISTANCE BULLETIN

News You Can Use

UNDERGROUND STORAGE TANK OWNERS COMMON VIOLATIONS

Purpose

The purpose of this Bulletin is to alert owners and operators of underground storage tanks (USTs) to compliance violations that are commonly found during UST inspections conducted by the Environmental Management Department (EMD).

Issue

Analysis of inspection data has shown that some UST violations occur routinely and repeatedly. These common and often repeated violations may ultimately result in the release of hazardous substances from USTs to the environment. **We wish to assist you in taking the necessary steps to ensure that your facility avoids deviating from the following regulatory requirements:**

- **Accurate completion of UST forms.** The ownership, operator, construction, monitoring, and spill response of UST system must be documented on the following forms:
 - Facility/Tank Forms
 - Written Monitoring Plan
 - Financial Responsibility Form

As a condition of your UST permit, a current set of these forms must be kept on site and be made available to employees and inspectors.

- **Written monitoring and maintenance records:** These records be maintained on site and include the following:
 - Logs of all readings of gauges or other monitoring equipment, ground water elevations, or other test results
 - Results of inventory readings and reconciliations
 - Results of any visual observations
 - Date/time of all monitoring or sampling
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- Monitoring equipment calibration and maintenance records
- Results of all sample analysis performed in the laboratory or in the field, including laboratory data sheets and analysis used
- **Monitoring equipment:** During the normal course of operation, monitoring equipment, such as leak detection sensors or mechanical line leak detectors, will fail or breakdown. It is very important that all monitoring equipment be properly functioning at all times.
- **Water in the secondary containment:** Rainwater, water from vehicle washing, or water from site drainage can often accumulate in the UST secondary containment area (i.e. sumps). This water, which usually mixes with fuel residue in the containment area, becomes a hazardous waste and interferes with the sensor operation by sending false alarms.
- **Spill Containment:** Spill containment (i.e. spill bucket) must have a 5 gallon capacity. Some spill containers do not meet this volume requirement and many are not sealed tight allowing water intrusion and a reduction in containment capacity during emergency fuel spills.
- **Employee training:** Inadequate training in spill response and hazardous materials/waste management is frequently observed. Current employee training is important to the proper operation of the facility. Make sure that records of employee training are current, complete and kept onsite.

What This Means To You

If left uncorrected over a significant time period, the violations listed above can result in the suspension of your UST Permit and/or subsequent enforcement action. We urge all UST owners or operators to promptly take the necessary steps to assure compliance with all statutory and regulatory requirements. These measures include, but are not limited to:

- Review and update all UST forms after any changes to the system. These forms are available in the EMD office or on line at www.emd.saccounty.net.
 - Investigate any abnormal system operations, such as level alarms, leak detection sensors, or system shutdown. Record the investigation findings on a written maintenance log. Record any observable releases into the sumps and notify EMD if releases are reportable.
 - Conduct annual monitoring system certification. Repair any equipment failures promptly.
 - Regularly check and remove all water in sumps or spill containers. Dispose of any fuel contaminated water as hazardous waste.
 - Train employees on hazardous materials/emergency response. New hires must receive this training within six months after hiring. Annual refresher training must also be provided to employees.
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**For More
Information
Or Assistance**

If you are unclear or have any questions concerning these requirements or the compliance status of your UST system, you can contact your EMD District Specialists listed on your most recent inspection report. If you are unsure about the identity of your EMD Specialist, call John Elkins at (916) 876-7884.

Disclaimer

The information contained in this Compliance Assistance Bulletin is based upon the statutes and regulations and is intended to provide a basic overview to help achieve compliance. This document does not replace or supersede relevant statutes and regulations and is not intended as legal advice. All interested parties should monitor changes to relevant statutes and regulations for updates.

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