



State of Oregon

JANUARY 2021

Department of Environmental Quality

TANKLINE *Bulletin*

UST Rules Changed in October

On Oct. 1, the new UST Rules took effect. Regulated USTs are subject to additional testing requirements, and emergency generator USTs are no longer exempt from release detection requirements. Oregon DEQ has inspected 87 facilities since then. The most common violations found are:

- Failure to inspect overfill equipment at least once every 3 years
- Failure to install, operate, maintain or calibrate release detection equipment per manufacturer's instructions, including service checks for operability or running condition
- Failure to conduct monthly periodic operation and maintenance walkthrough inspections
- Failure to test spill prevention equipment at least once every 3 years
- Failure to maintain records of spill or overfill equipment inspections/test for 3 years
- Failure to maintain adequate records of automatic tank gauge monitoring and testing results.

See our *Underground Storage Tank Compliance Program 2018 Rule Changes & Other Related Guidance Directive* (<https://www.oregon.gov/deq/FilterDocs/ust2018RulesDirective.pdf>) for more information on these new requirements

Your DEQ Online

Our agency-wide Environmental Data Management System is due to start rolling out in 2021. The UST program is in the second wave of transitions, currently scheduled for September. Your DEQ Online will let you submit payments and forms electronically and see all of the DEQ programs that affect your facility, all in a web-based interface. Find more information on the project web site:

<https://www.oregon.gov/deq/Permits/Pages/Your-DEQ-Online.aspx>



Sign up with your email and receive free walkthrough forms!

We're collecting emails from our permittees to prepare for Your DEQ Online and improve communication. Provide your email address to us, and we'll send you updates, such as new/updated forms, invoice reminders, *Tankline Bulletins*, updates from EPA, ASTSWMO, and Oregon. We are also hoping to have some new forms for walkthrough inspections, tri-annual testing, and release detection testing for use in February, which we will send out to all of the emails we have.

Register your email with your facility here: <http://tinyurl.com/USTDEQ>

Considering Repairing Older Tanks?

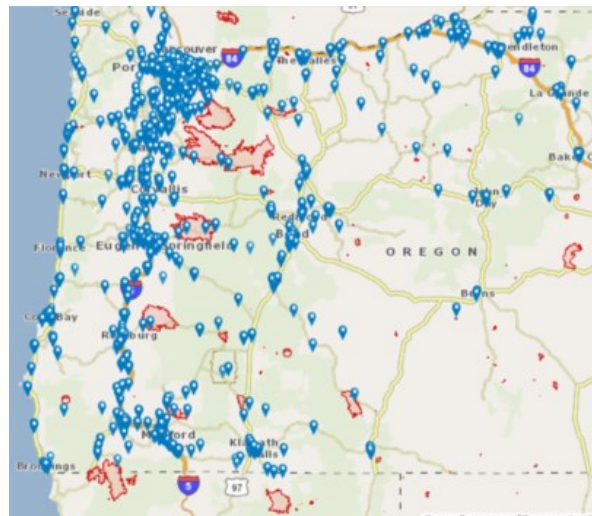
Oregon has over 5,000 active, regulated underground storage tanks (although remember that we count each tank compartment separately) and the average age of these tanks is almost 27 years. As these tanks approach the end of their lifespan, it can be tempting to consider repairing tanks that fail. Oregon's UST repair regulations (OAR 340-150-350) are mainly intended to apply to new tanks that were damaged in transit or during installation. *The UST must be re-certified after the repair by the manufacturer.* The rule states:

For all repaired tanks except those repaired by lining, obtain written documentation that the original manufacturer has recertified the repaired UST as meeting current UST performance requirements. If the original manufacturer is not available (e.g., no longer in business, unknown, etc.) another manufacturer of the same tank brand or type must certify in writing that the tank meets the current UST performance requirements.

Oregon Wildfires

When wildfires exploded across the state over Labor Day, UST staff were able quickly to identify affected sites using an interactive map connected to our database. Inspectors reached out to facilities within the fire perimeters and found the two stations that suffered complete losses due to the Lionshead and Holiday Farm fires. Working with EPA emergency response, DEQ ensured that the tanks were pumped dry and put into temporary closure. No fuel was released into the environment, despite the total destruction of the aboveground equipment.

Our hearts go out to everyone in Oregon affected by this disaster.



Updates to Service Provider Roundtable Q&As

Spill Prevention Equipment Testing

20. Are repairs for spill buckets (inserts) allowed and is there a specific fluid volume capacity?

Answer: Failed or damaged spill buckets can be repaired, as long as the repair method conforms to a nationally recognized standard or manufacturer-recommended practice and utilizes compatible materials. Neither federal nor Oregon rules specify a minimum volume capacity. For more information about spill buckets, we suggest reading EPA's brochure, "Spill Buckets: Best Practices for Your Underground Storage Tank" found on EPA's website. (<https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P100E1AA.txt>) (November 2020) DEQ recognizes NLPA/KWA Standard 823 for a standard available for spill bucket repair.

Overfill Equipment Inspections

25. If a high level audible alarm and/or drop tube flapper valve are used as an overfill device and tested every three years according to OAR 340-150-0310(9), do UST systems still containing a ball float vent valve need to test the ball float valve every three years?

Answer: (November 2020) Only the method of overfill prevention being used to meet the UST rules must meet the overfill prevention inspection requirement in OAR 340-150-0310(9). Owners and operators must ensure any secondary overfill methods they use do not interfere with the primary method they use to meet the overfill prevention requirement. You should not use an automatic shutoff device if the UST receives pressurized deliveries. Ball float overfill devices cannot be used with co-axial drop tubes.

Release Detection Equipment Operability Testing

29. Do line tightness tests records need to be available for three years?

Answer: No, an owner and permittee must retain, at a minimum, the most recent completed line test, whether that was an annual or triennial test per OAR 340-150-0410(8). (November 2020) However, line leak detector test records will need to be kept for as long as the equipment is in use in accordance with OAR 340-150-0400(5).

The full text of the *2018 Rule Change and Other Related Guidance* is available at <https://www.oregon.gov/deq/FilterDocs/ust2018RulesDirective.pdf>