



New Fuel Drop Requirements

DEQ has updated our process for approving fuel drops for testing newly-installed USTs. In order to ensure that all tanks containing petroleum are protected with leak detection, and that fuel drop requests are handled consistently, we require that a UST Permittee, or service provider representing a permittee, send a written request for a fuel drop for testing purposes to the appropriate DEQ Regional Office. Email to UST inspectors to request approval is both allowed and preferred. The directive for UST inspectors to approve fuel drops was created to ensure consistent review, which didn't always happen in the past. The request must contain the following documentation:

- Proof of financial responsibility
- Documentation demonstrating installation of all required release detection equipment
- Output from automatic tank gauge showing that all interstitial monitoring sensors including; sump, under dispenser containment, and annular space sensors are active and properly programmed
- Passing primary and secondary testing results from all installed lines
- Testing results demonstrating tank tightness
- Documentation demonstrating installation of all required spill and overfill protection equipment
- As-built drawings of the installation that comply with OAR 340-150-0010(3a-b)
- Passing integrity tests of spill buckets and sumps

DEQ will no longer approve using fuel as ballast for UST installations. For more information, please see the directive on our web page at: <https://www.oregon.gov/deq/tanks/Pages/usttechinfo.aspx>

Insurance for Aging Tanks

EPA recently reached out to several insurance providers about trends in the industry and factors they consider when underwriting UST systems. Although many current providers are unwilling to insure USTs 30-year-old and older, EPA found a few companies that continue to insure aging USTs. Each provider identified different conditions under which they do so. Because insuring USTs involves many equipment- and site-specific factors, owners and operators should contact their insurance agent or broker to discuss their unique risk profile and insurance options.

Please see www.epa.gov/ust/ust-technical-compendium-financial-responsibility for questions and answers about financial responsibility for USTs and www.epa.gov/ust/list-insurance-providers-ust-financial-responsibility-requirements for a list of names of providers and information about financial responsibility.

The insurance providers surveyed by EPA generally agreed that owners and operators can increase the likelihood of obtaining coverage by taking certain actions. For example, owners and operators can demonstrate compliance by maintaining thorough inspection and system maintenance records. Question 13 of the Technical Compendium addresses what UST owners and operators of aging USTs can do to renew or obtain insurance to meet the financial responsibility requirement.

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) have a guide to UST insurance at <https://astswmo.org/guide-to-tank-insurance/>. The guide provides information on tank insurance, including definitions, resources, regulatory requirements, types of insurance, reporting requirements, and questions to ask when purchasing tank insurance.

Service Provider Listing

We now have an updated list of Oregon-licensed UST service providers available on our website:

<https://www.oregon.gov/deq/tanks/Pages/UST-Service.aspx>

Air Quality Requirements for Gas Stations

DEQ's Air Quality (AQ) program regulates all gasoline dispensing facilities (GDFs) to reduce the emission of gasoline vapors. Gasoline vapors contain benzene, a known cancer-causing chemical, and also worsen smog and waste gas. Operators of GDFs that dispense large quantities of fuel are already familiar with these requirements, as they are required to maintain an AQ permit.

Regardless of whether or not your facility has a GDF permit, if you dispense gasoline, your facility is subject to the National Emission Standards for Hazardous Air Pollutants rules. You are already familiar with vapor recovery nozzles and submerged fill pipes. But have you opened your turbine sump and noticed a persistent odor of gasoline? You are probably in violation of [OAR 340-244-0240](#) (1), which states:

The owner or operator of a GDF must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time.

Current blends of gasoline contain 10% ethanol. The presence of ethanol attracts water from the atmosphere, and the combination creates ideal conditions for the growth of acetobacter, which are the same bacteria that turn wine into vinegar. Vinegar is an acid, and very corrosive. Over time, this is what can happen to turbine heads.

Low to Moderate



Significant



Severe



Severe corrosion can crack a turbine head and allow gasoline to escape.

UST inspectors include AQ equipment and paperwork in their inspections at facilities with Stage 1 GDF permits outside of the Portland Metro and Salem-Keizer AQ Maintenance Areas. But they can and will cite violations of AQ rules at other facilities, especially in cases like the photo at the right.

Keep your turbines clean and free of corrosion!

Most Common Violations Since 7/1/2021

Description	Violations
Failure to complete initial overfill, spill prevention or interstitial containment testing requirements by October 1, 2020	73
Failure to conduct monthly periodic operation and maintenance walkthrough inspection by 10/01/20 and each month thereafter.	27
Failure to perform an annual test of operation of line leak detector or annual test has not been conducted in accordance with manufacturer standards.	11
Failure to perform annual line tightness test on pressurized piping or test cannot detect a 0.1 gph leak rate at 1.5 times operating pressure	11
Failure to maintain adequate records of ATG monitoring and testing results.	11
Failure to repair or replace spill prevention device that is not properly maintained, is defective, is damaged or may have been tampered with in a manner that prevents proper operation.	9
Failure to install, operate, maintain or calibrate RD equipment per manufacturer's instructions, including service checks for operability or running condition (i.e. device has been incorrectly installed, is defective, damaged, or may have been tamper	8
Failure to test spill prevention equipment at least once every 3 years	7
Failure to conduct the most recent 3-year corrosion protection test.	6
Failure to have a trained UST System Operator for an UST facility or to provide emergency response information.	6

We know that the new rules continue to be a challenge. Find previous editions of the *Tankline* with discussion of the new requirements on our website <https://www.oregon.gov/deq/tanks/Pages/UST-Forms.aspx>