



Underground Storage Tanks

GECAP of the Georgia Tech Research Institute is a voluntary, non-regulatory environmental compliance program funded by the Georgia Legislature through the University System of Georgia.

Do I need to register my Underground Storage Tank (UST)?

Yes. Your UST system can be installed without preapproval from or registration with the Georgia Environmental Protection Division (EPD); however, it must be registered with the EPD prior to filling and operating the UST system. To register a UST in Georgia you need to complete and submit the EPD Notification Data for Underground Storage Tank form (form GUST-42). The GUST-42 form is available under the Forms link on the EPD website (<http://epd.georgia.gov/underground-storage-tank-forms>) or <http://www.gecap.org> or by calling 404-362-2687.

The form should be sent to:

EPD USTMP
4244 International Parkway
Suite 104
Atlanta GA 30354

In response to the GUST-42, the EPD will issue an Annual UST Registration Certificate. Once the certificate is obtained, the UST system can be filled and put into operation. The GUST-42 form must be submitted annually and when any UST system modifications are made.

What regulations apply to UST systems?

All UST systems must have release detection, spill and overflow prevention, and corrosion protection.

Release Detection

- Federal regulations (40 CFR Part 280 Subpart D) require owners and/or operators (O/O) to have release detection for both tanks and piping. "Existing" UST Systems (those installed on or before December 22, 1988) were required to implement a release detection method by December 22, 1993. "New" UST Systems (those installed after

December 22, 1988) are required to implement a release detection upon installation.

Tank Release Detection

There are two categories of tank release detection: *inventory control* and *monthly monitoring*.

Inventory control must be used in conjunction with tightness testing. This method can be used for ten years after a tank has been installed or upgraded with corrosion protection, whichever is later. Inventory must be collected daily and reconciled monthly. A tightness test must be performed every five years after the tank has been upgraded or installed with corrosion protection. After the ten-year period, the O/O must change to a monthly monitoring method to comply with the tank release detection requirements.

Using a *monthly monitoring* method to meet the tank release detection requirements includes checking the tank for leaks at least once a month using one or a combination of the following methods:

- Manual Tank Gauging (this method can be used as the sole method of leak detection for the life of the tank for tanks with a capacity of 550 gallons or less. It can also be used in combination with tank tightness testing for 10 years after the tank was upgraded or installed with corrosion protection for tanks 2,000 gallons in capacity or less);
- Vapor Monitoring;
- Groundwater Monitoring;
- Automatic Tank Gauging (ATG);
- Interstitial Monitoring; and/or
- Statistical Inventory Reconciliation (SIR).

Each monthly monitoring method has specific requirements and/or limitations that must be consid-

ered when determining whether a UST System is in compliance.

Piping Release Detection

The type of release detection required for piping depends on the type of piping system.

- Suction piping that has only one check valve directly under the pump (also called “European”) does not require any release detection.
- Suction piping with a valve at the tank (also called “American”) requires the use of either a monthly monitoring method (same methods as for tanks) or a tightness test every three years.
- Pressurized piping requires an annual tightness test or a monthly monitoring method and the use of an automatic line leak detector (ALLD).
- Double-walled piping that is continuously monitored with a sensor and alarm does not require the use of an ALLD.

Spill and Overfill Prevention

“Existing” and “New” UST Systems must have been upgraded to include spill and overfill prevention by December 22, 1998. Spill prevention is required if transferring more than 25 gallons at one time and must prevent the release of product when the transfer hose is detached. Typically, a catchment basin is installed surrounding the fill pipe of the tank.

There are three methods for meeting the overfill prevention requirements:

- equipment will automatically shut off flow into tank at 95% full;
- an alarm will alert the supplier when the tank is at 90% capacity;
- the supplier will be alerted by the creation of enough back pressure to restrict product flow into the tank.

Typically a ball float valve, flapper valve, or an audio/ visual alarm are added to meet the overfill prevention requirements.

Corrosion Protection

Corrosion protection must have been added to an “Existing” UST System (any UST System installed prior to December 22, 1988) by December 22, 1998, by using one of the following methods:

- internally coating a tank with a corrosion-resistant substance (the coating must be inspected internally 10 years from installation and every

five years thereafter), or

- installing an impressed current system on the bare steel tank and piping.

Any UST System installed after December 22, 1988 (“New” UST System) must be a cathodically protected steel tank (Sti-P₃[®]) or be composed of a non-corrodible material, such as fiberglass-reinforced plastic (FRP).

What do I do if my tanks do not meet the upgrade requirements?

All UST Systems must have release detection (1993), spill and overfill prevention (1998), and corrosion protection (1998). If you have a UST System that does not contain corrosion protection, it should be closed immediately. If you have a UST System that is upgraded and the system is empty, the corrosion protection must be maintained. If you have a UST System that is upgraded and the system contains product, release detection requirements must be continuously met.

What should I do if I discover that my UST System is leaking?

A suspected release should be reported to the EPD UST Management Program (USTMP; 404-362-2687) within 24 hours. A tightness test and/or site check should be conducted to confirm or resolve a suspected release. If the suspected release is confirmed, the O/O should report the confirmed release within 24 hours.

What should I do if I decide to close my UST system?

Notify the Georgia EPD USTMP thirty days before you permanently close the UST System by submitting a Closure Activity Form (GUST-29). In addition, you must submit a Closure Report Form within 45 days of permanently closing the UST System. You can find the GUST-29 and Closure Report Form on the EPD web site at <http://epd.georgia.gov/underground-storage-tank-forms> or <http://www.gecap.org>, or by contacting the EPD USTMP technical assistance duty officer at 404-362-2687. The UST should be closed by following standard safety practices.

If a release of product is discovered during removal activities, it must be reported to the EPD USTMP within 24 hours.

What should my company do to ensure that we are in compliance with EPD USTMP?

You should have the following records available:

- Annual tank registration certification.
- Release Detection:

Tanks

- The last three years of release detection records if the facility is a Georgia Underground Storage Tank (GUST) trust fund participant.
- The last year of release detection records if the facility is not a GUST trust fund participant.
- Calibration records of leak detection equipment installed on-site.
- Any repair records (need to be maintained for the life span of the system).

Piping

Suction piping with valve

The last tightness test record or monthly monitoring records for the past three years.

Pressurized piping

- The last three years of tightness test records OR the last three years of monthly monitoring reports AND the last three years of ALLD tests, if the facility is a GUST trust fund participant.
- The last year of tightness test records OR the last year of monthly monitoring reports AND the last year of ALLD tests, if the facility is not a GUST trust fund participant.
- Corrosion Protection
 - Records documenting the installation of a corrosion protection system upgrade for existing UST systems or a corrosion protected UST System.

- Records confirming the initial cathodic protection test conducted six months after installation.
- Results of the last three 60-day rectifier inspections on an impressed current system.
- Records documenting the results of the last two cathodic protection system tests.
- Records showing that after any UST System repair, a cathodic protection survey has been completed within 6 months of the repair.

• UST System Upgrade and Repair

Any records showing that a repaired or upgraded UST System was properly repaired or maintained.

• Closure

The UST System closure report must be kept for at least three years.

For more information

- Contact the GECAP Program at 404-407-8082.
- Visit EPA's Office of Underground Storage Tanks at <http://www.epa.gov/oust>.

The following resources may help:

- EPA Project Summary Technical Aspects of Underground Storage Closure, available by contacting the EPD USTMP at 404-362-2687.
- American Petroleum Institute (API) Bulletin RP 1604, 1996, Closure of Underground Petroleum Storage Tanks, Third Edition. This publication is available from:

American Petroleum Institute
Publications and Distribution Section
1220 L. Street, NW
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202-682-8375
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<http://www.api.org>

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