

# ABOVEGROUND STORAGE TANKS



UTAH DEPARTMENT *of*  
ENVIRONMENTAL QUALITY

**ENVIRONMENTAL RESPONSE  
& REMEDIATION**

Brent H. Everett, Director

Division of Environmental Response and  
Remediation

Therron Blatter, UST Branch Manager

Division of Environmental Response and  
Remediation

Dan Hall, Ground Water Section Manager

Division of Water Quality

---

# DEQ'S MISSION AND VISION

## Mission:

Safeguarding and improving Utah's air, land and water through balanced regulation

## Vision:

Clean air, land and water for a healthy and prosperous Utah



---

# THE ABOVEGROUND STORAGE TANK CONCERN

Over the past ten years the DEQ has been made aware of several petroleum releases from Aboveground Storage Tank systems (ASTs) that have had significant negative impacts on citizens of the state and the state's groundwater resources. Due to the increasing age of many of the AST systems, the DEQ expects that releases from AST's will continue or even increase in the future.

# EXAMPLES OF AST SYSTEMS



# PRIMARY SOURCE OF PROBLEMS: AST SYSTEMS WITH UNDERGROUND PIPING



---

# UTAH'S AST POPULATION

- DERR has records of 2,050 tanks at 835 facilities
  - Not an accurate inventory
  - Mostly gas stations and larger commercial facilities that are filing to get the PST Fund surcharge refunded
- Over 250 releases from ASTs have be reported to the DEQ over the past 30 years

---

# CURRENT STATE OF REGULATION

- Spill Prevention, Control and Countermeasures (SPCC)
  - Administered by the EPA
  - Prevent oil discharge into navigable waters
  - Does not address groundwater
- International Fire Code
  - Installation and operation standards for ASTs storing flammable and combustible liquids
  - Public safety oriented
- Permitted by rule under Division of Water Quality

---

# RELEASE OVERSIGHT AND CLEANUP

- DWQ has authority under the Clean Water Act if groundwater has been impacted (or threatened)
- DERR and DWQ Memorandum of Agreement
  - Responsible party can choose to work with either DERR or DWQ under DWQ authority to cleanup site and receive No further Action determination
  - For DERR led releases where the Responsible Party does not voluntarily complete the cleanup, DWQ takes the lead



# UST REQUIREMENTS COMPARED TO ASTS

<b>Underground Storage Tanks</b>	<b>Aboveground Storage Tanks</b>
\$1 million of financial assurance required for release cleanup	No financial assurance required
Distinct requirements for release reporting, investigation, and cleanup	Reporting and cleanup required if the groundwater has been impacted or threatened.
Release prevention and release detection requirements consisting of: <ul style="list-style-type: none"><li>• Operation and maintenance standards</li><li>• Routine system testing and monitoring</li><li>• Regular Compliance Inspections</li></ul>	Spill control dikes required, no other release prevention or release detection measures and no DEQ compliance inspections



---

# AST CHALLENGES

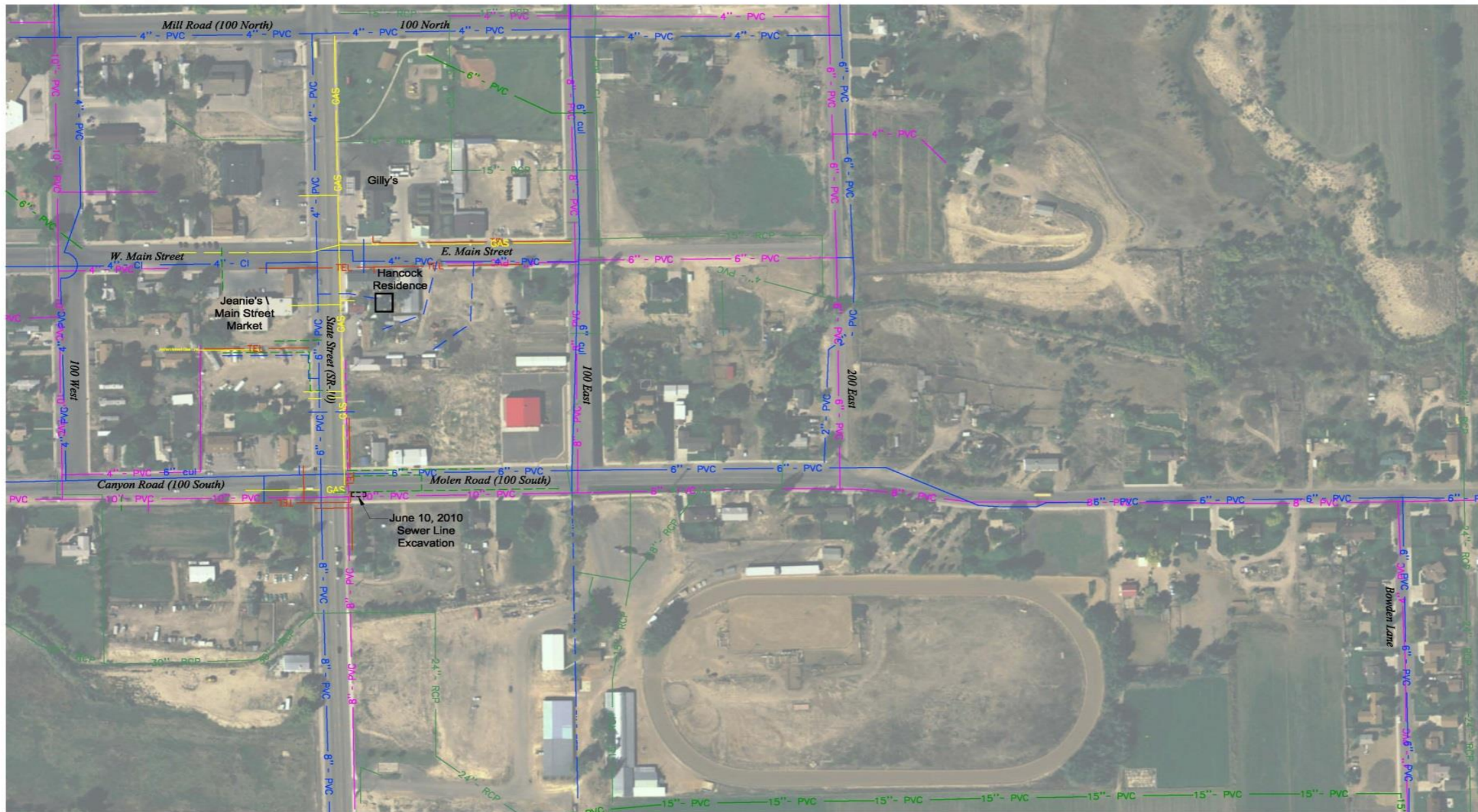
- No financial responsibility requirement similar to USTs so money for cleanup is often unavailable
- Because AST system tests are not required, releases are often not discovered until they have impacted off-site properties
- AST owners are often unfamiliar with DWQ release reporting requirements
- AST and UST release cleanups are basically the same but the DERR staff that specialize in these cleanups do not have direct authority for ASTs

---

# AST CHALLENGES

- Often the responsible party does not have a clear path to site cleanup and No Further Action determination
- When the responsible party is unknown, unwilling, or unable; there are very limited to no resources available to investigate and cleanup the release
- DERR has no authority to recover PST Fund monies expended to cleanup an AST release that is co-mingled with a Fund covered release

# FERRON



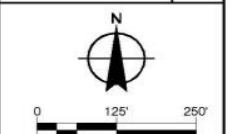
Explanation			
4" - PVC	2" - PVC	5" - HDPE	12" drain
6" - PVC	4" - PVC	6" - PVC	15" - RCP
8" - PVC	4" - CI	8" - PVC	18" - RCP
10" - PVC	6" cul	8" - AC	24" - RCP
15" - PVC	TEL	15" - PVC	30" - RCP
<b>Reclaimed Water Lines</b>	<b>Culinary Water Lines</b>	<b>Sewer Lines</b>	<b>Drain Lines</b>
			GAS
			<b>Gas Line (Yellow)</b>

**IHI**  
ENVIRONMENTAL  
640 E. Wilmington Ave.  
Salt Lake City, UT 84106  
801.466.2223  
ihi@ihi-env.com



Utah Department of Environmental Quality  
Emergency Response  
Ferron, Utah

Figure 2: General Site Map



PROJECT No:	10U-E7116
SHEET:	2
DRAWN BY:	MBradley
DATE:	7-19-10
REVISED BY:	
DATE:	
REVIEWED BY:	
DATE:	

T:\10\0101\Projects\10U-E7116\DEIR - Emergency Response - Ferron - UT\CAD\Drawings\10U-E7116\Fig 02.DWG, Pkg-Cad\Shades, 7/19/2010 1:25:02 PM, mbradley



# NAPLES



---

# AST REQUIREMENTS IN NEARBY STATES

- **Colorado:** Similar to USTs for ASTs between 660 and 40,000 gallons, excludes farm and heating oil tanks
- **New Mexico:** Similar to USTs for ASTs between 1,300 and 55,000 gallons, excludes farm tanks
- **Wyoming:** Similar to USTs for ASTs at retail sites
- **Montana:** Similar to USTs for ASTs with connected underground piping
- **Nevada:** Similar to USTs for ASTs that voluntarily participate on State Cleanup fund
- **Idaho:** Only requirement is reporting of AST releases
- **Arizona:** Only requirement is reporting of AST releases



---

# POTENTIAL NEXT STEPS

- Maintain status quo
- Require ASTs to obtain financial responsibility
- In addition to financial responsibility, provide specific authority to regulate AST cleanups
- Regulate ASTs similar to USTs
  - Financial responsibility
  - Defined cleanup authority
  - Prevention (testing & inspections)