



UST TALK

Agency of Natural Resources, Department of Environmental Conservation
 Waste Management & Prevention Division
 Underground Storage Tank Program
 1 National Life Drive, Davis 1, Montpelier, Vermont 05670-3704
 Telephone : (802) 828-1138



UST Staff

Marc Roy— 522-0275
 Marc.roy@state.vt.us

Ted Unkles —522-0488
 Ted.unkles@state.vt.us

June Reilly-522-0231
 June.Reilly@state.vt.us

Susan Thayer-522-0487
 Susan.thayer@state.vt.us

Jaymi Cleland—917-1386
 Jaymi.cleland@state.vt.us

A Newsletter for Underground Storage Tank Owners / Operators

Published by Waste Management & Prevention

Along with Spring Thaw Comes Water Where We Don't Want It!

It's no secret that this winter has been unusually cold, but spring will eventually arrive. When the ground finally thaws, it's likely that we will see water getting into places where we don't want it: tank-top sumps, dispenser sumps, and spill buckets. Ideally, all sump wall penetrations should be perfectly sealed, but that is often not the case, and re-sealing those penetrations is a warm-weather job. But, there are some things you can do now to minimize the problem of water entering sumps and spill buckets as the spring (eventually) reaches our frozen land:

- Check your snow piles. All winter long you have been plowing your lot, and there's probably a lot of snow piled up along the edges. Look at the grade of your lot, and think about where the melt water will flow. Will it go toward your tank pad or dispensing islands? If so, it might be worthwhile to remove the snow before all that water runs toward your UST systems. Yes, it's expensive to pick up and haul away all that snow, but any water that gets into your sumps or spill buckets will have to be handled as hazardous waste, unless laboratory analysis shows it to be uncontaminated. Testing and/or shipping off all that water as hazardous waste may be even more expensive.
- Check your sump lids. It's not practical to re-caulk your sump penetrations in the winter, but if the foam rubber gasket is missing or loose from the sump lid, you can replace that. Some sumps are designed for the lids to be secured with bolts or bungee straps. If those are present but not tightened, that is certainly worth doing before the snow melts.
- Check your canopy drains. Many canopies have drain

lines that run very close to the dispensers. If the drain lines are clogged, the water draining off your canopy may spill out of the drain pipe and find its way into the dispenser sump.

Every spring, despite these efforts, water does get into sumps. If your sensors go into alarm because they detect liquid in the sumps, that must be reported to the UST program, and the sumps must be emptied promptly. Ignoring a sensor in alarm is a serious violation of Vermont's UST Rules.

Finally, if you have a system that does have water problems, once the warm weather finally arrives (and it will – eventually) be sure to have a qualified UST contractor seal the sumps and improve drainage to prevent future water infiltration.



Our inspector found this spill bucket completely filled with ice. How do you suppose this tank owner will prepare for the next delivery?

UST Inspection Season Coming Soon!

The Vermont UST Program is gearing up for another inspections season and would like to take the opportunity to remind people of some of the more common issues we see.

-Operator Training Monthly Checklist- One of the most common violations is the failure to perform and document monthly inspections as required by Operator Training. The Class A or B operator, or a person working under the supervision of a Class A or B operator, is required to conduct and document a monthly onsite inspection of the facility. The operator must inspect the facility for any conditions that would require an immediate action, such as any indication of a spill or release or any alarms indicating a suspected release. The Class A or B operator must ensure that documentation of each inspection is kept and made available for review during a Vermont State inspection. This is in addition to your *weekly* leak detection monitoring.

-No documentation of leak detection- Tank owners are required to maintain at least three years' worth of weekly leak detection documentation for tanks and secondarily contained piping; whether it is manually/visually checked, or an in-tank monitor (probe) that does leak tests, or liquid monitoring sensors, you are required to document. **Inventory is important, but it is not leak detection documentation.**

-No leak detection/monitoring- During inspections we find a lot of electronic liquid sensors that are not operational. Just because the monitoring equipment for your tank system doesn't indicate a problem, you can't automatically assume your sensor is working. It is recommended that you test the functionality of your sensors annually at the very least. A perfect time to do this is when you are completing your yearly Self-Certification inspection.

Another issue that we find very disconcerting is that

THE CLASS A OR B OPERATOR, OR A PERSON WORKING UNDER THE SUPERVISION OF A CLASS A OR B OPERATOR, IS REQUIRED TO CONDUCT AND DOCUMENT A MONTHLY ONSITE INSPECTION OF THE FACILITY.

liquid sensors are anchored above the bottom of the features they are monitoring. The reason the sensors are raised up is because there is a problem and somebody wanted to take a short cut. The only thing that this will solve is it will shut off the alarm on your electronic monitoring system.

The only way to properly solve this issue and come into compliance is to remove all liquid from containment feature and ensure that the liquid sensor is at the lowest portion of the device it is monitoring. If the liquid returns it must be reported to the Vermont UST Program.

-Leaking dispensers - Dispenser weeps and drips are more common than you think. Failed seals and gaskets and loose fittings are usually the culprits. If your dispenser is discovered to be leaking during an inspection and you don't have a piping sump, you most likely will be required to investigate the extent of soil contamination via a costly environmental assessment. To avoid this, it is recommended that the inside of your dispenser be checked frequently for weeps and drips. Please also remember any dispenser installed after August 1, 2007 is required to 1) have a dispenser sump and 2) be monitored for leaks and documented.

-Spill buckets containing liquid- Please check your spill buckets for water or fuel. These devices are designed to capture spills or overfills during delivery. If you have liquid in your spill bucket then it has less volume and will be less effective containing spills.

If your spill bucket doesn't hold liquid then you must replace it. If your spill bucket is not in good condition (i.e. cracked or rusty) it is a good idea to replace it before a release occurs! This could save you money and the headache of a potential environmental assessment down the road. Unless the UST Program issues a variance before the new bucket is installed, spill bucket replacements are required to be at least 15 gallons in capacity.

The difference between A/B Operator certification, and Self-certification

Last December we sent emails to tank owners reminding them to do their 2014 self-certifications. In addition, some tank owners were also told it was time to renew their A/B operator certification. What came to light was that some tank owners thought one was the same as the other. Sorry, not so! Here is the difference between the two:

⇒ **SELF CERTIFICATION** is where the A/B operator or his/her designated person conducts an inspection of the facility, then reports the compliance results on our self-certification webpage: <http://www.anr.state.vt.us/dec/wastediv/ust/selfcert.htm>

Self Certification is an annual requirement (since 2007) and should help owners find and repair compliance problems before they lead to leaks or releases, and is due by 12/31 of EVERY YEAR.

⇒ **A/B OPERATOR** – this is a federal requirement and has been since 2012. Tank owners are required to have a person with knowledge of the operating requirements of an underground storage tank system and also the paperwork that is required for the state in which they operate. The A/B operator has to get trained by a third party, and receive certification the training was successfully completed. In 2012, we approved a number of third-party entities who developed online courses with tutorial and tests. The vendors with approved online trainings are: ECS Eclipse, PASS and the State of Maine's TankSmart.

In addition to these online courses, we accept the A/B certification from the State of New Hampshire; this is an in-class, day-long course held in New Hampshire. All of the above mentioned third-party tests are for all tank operating systems – suction, pressurized and gravity.

Because 35% of tank compartments in VT are suction systems, we devised the Vermont Simple Suction Test. This A/B operator certification is valid ONLY if all tank compartments at the facility are operated under suction.

If a tank system is pressurized then one of the third party certifications has to be obtained.

Each A/B operator certification is for two years, so if you were certified in 2012 you were required to get recertified in 2014.

June has been delighted to see that many of you who have submitted your recertification after she asked for it did it timely, but just forgot to send a copy to her. Keep that up and June will be happy! We are now looking for the timely recertification of those who were first certified in 2013.

We acknowledge that a lot of the confusion stemmed from the fact that the Vermont Simple Suction test is available online on the same page as the self-certification. Please note the difference between the second and third lines on the page that shows after you have logged in.

Both the annual Self-certification and the Simple Suction A/B certification require logging into the system with a user ID and password. New accounts can be created by new persons with the facility access code that is sent to the owner/operator via a letter in August of each.

“What’s wrong with this picture?”



Citations for UST violations in Vermont

The UST Program has begun issuing civil citations for certain violations of the UST Rules. Citations generally apply to a relatively small penalty for violations, in a quicker timeframe than traditional enforcement cases. Citations are another tool in the Program's enforcement toolbox, which will hopefully provide a deterrent effect, resulting in continued compliance. Citations also help to get people into compliance at an earlier stage and then hopefully stay in compliance, thereby avoiding a more significant enforcement action in the future.

This Environmental ticketing works somewhat like traffic tickets; the person receiving the ticket can simply pay the citation, or appear before a judge and appeal the citation. Citations are issued with a minimum and maximum penalty, and a deferment amount – i.e. the amount paid if the alleged violator chooses not to argue the citation (this amount is more than the minimum, but less than the maximum). However, citations are not issued in the field; but sometime after the inspection takes place. In addition, draft citations are posted on the Agency web site for 30 days to allow for public comment before the citations are finalized.

Annual Self Certification

Even though there is still snow on the ground, you should be thinking about the self certification which you can submit any time between August 1 and December 31.

WHO completes it? AB operators, or their designated person?

WHERE is the webpage? <https://anrnode.anr.state.vt.us/ust/>

HOW to get started - Log on with user ID and password created some years back (Note: self-certification has been a requirement since 2007) **OR** create an account with the access code that the UST Program provides in a letter mailed each August. A new account is required if a new person is doing the self-certification or the email address has changed.

WHAT has to be done? 6 pages to complete, one page at a time, AND only the questions in dark grey are applicable and to be answered. If you cannot respond to a question, then that question does not apply to the facility. When all the questions are answered the 7 page is the signature page and the person completing the self-certification must fill in his/her name, their authority for completing, tank owner's name, and the date. HIT the SUBMIT button and you will be done.

The email address from which the self certification was completed will receive an email confirming its completion.

If you do forget your user ID and password call the tank staff.