

# UST TALK

A Newsletter for Underground Storage Tank Owners / Operators

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Underground Storage Tank (UST) Program



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## Field Notes – A Reflection on Last Year’s Inspection Season

All category one facilities must be inspected every 3 years. The UST Program conducted 355 compliance inspections throughout Vermont in 2013. We inspected retail gas stations, hospitals, town and state highway garages, telecommunication facilities, and locations where the USTs are out of service. The compliance rate (meaning that there were no significant violations found during the inspection) was 88% for the field season. The UST Program sent over 40 Notices of Alleged Violations (NOAVs) for facilities not in compliance with the UST Rules.

The most common violations we found was the failure to perform and document **monthly inspections**. The monthly inspection must be conducted by the Class A or B operator, or a person working under the supervision of a Class A or B operator. The operator must inspect the facility for any conditions that would require an immediate response, such as any indication of a spill or release or any alarms indicating a possible 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.

The second most common violation was liquid (water and/or fuel) in the secondary containment of tank systems. Secondary containment is the “double wall” of your tank or piping. This violation led to combinations of the following violations:

- ◆ lack of monitoring (because the sensor was raised so the alarm won’t go off)
- ◆ failure to investigate a liquid alarm
- ◆ failure to report a suspected release.

Remember! Liquid in secondary containment that is removed must be managed in accordance with Vermont Hazardous Waste Regulations. This includes spill bucket waste.

For those who didn’t get a NOAV, thank you for being in compliance, keep up the good work! For those with NOAVs hopefully you can get back on track. Never hesitate to contact the UST Program with questions. 802-828-1138 is the main line to the office; just ask to speak with someone in the UST Program.

Vermont currently has a total of 968 category one facilities. This year the UST program will be inspecting 351 facilities. If you are curious if your facility will be inspected this year you can find the inspection list for 2014 on our website: <http://www.anr.state.vt.us/dec/wastediv/ust/home.htm> and look under “What’s New” at the top right of the page. Click on “2014 Underground Storage Tank Facilities Inspection List”. 100 of the 351 facilities were randomly selected from the UST database, so some facilities that were inspected last year or in 2012 are on this year’s list.



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## AB Operator Training –

### 2014 is renewal time!

For the past 15 months every permitted facility has had a designated level A and level B operator. Operators had to take and pass tests demonstrating knowledge of their UST systems.

Most of the A and B operators were certified in 2012 and the certification was for two years so operators need to re-certify in 2014 to be in compliance with the requirement to have a designated level A and level B operator.

This year, staff will be requesting updated certifications from you. All of the same certification programs are available:

International Code Council covers all system types. Information on Registration for testing & sample test questions available at ICC web page <http://www.iccsafe.org/Edu-Cert/Pages/default.aspx>. For this test you attend one of the testing centers but there is no class to attend. You obtain and read the information.

Environmental Compliance Services (ECS)/Eclipse covers all system types. The lecture sessions are oriented toward the federal regulations, but wherever Vermont's rules differ from the feds, a bold message scrolls across the screen explaining that Vermont's requirements differ from what the instructor is saying. The Eclipse program consists of about a dozen modules, and there's a quiz after each module. You can go back and watch a certain module as many times as you need to. Information can be found at this web page: <https://ecseclipse.com/training.html>

The State of New Hampshire has a classroom training and then a test available to persons who own a facility in that state.

The State of Maine has an online tutorial and then a test.

**New for 2014** PASS - Practical American Safety Solutions  
[www.passtesting.com](http://www.passtesting.com)

Contact: Raymond Rees, Vice President

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P.O. Box 2353, Muncie, IN 47307

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**AND** for suction operating system, the Vermont Simple Suction Test is available on the UST Program's website. Each person must create an account to take the simple suction test. Go to this website: <https://anrnode.anr.state.vt.us/ust/CreateExamAccount.aspx>. It would be a good idea to read the Manual prior to taking the test. The manual can be found at the below website.

It is the A/B operator's responsibility to ensure that their certification remains current.

Each facility is required to be inspected each month, either by the A/B operator or the person trained by the A/B operator. The purpose of the inspection is to ensure that all components of the tank system are operating correctly. Each monthly inspection must be documented and inspection records available for inspection by state personnel.

IT WOULD  
BE A GOOD  
IDEA TO  
READ THE  
MANUAL  
PRIOR TO  
TAKING THE  
TEST.

For more information on the A/B operator requirement, please go to the Vermont UST Program's web site:

<http://www.anr.state.vt.us/dec/wastediv/ust/Training.htm>

If you don't find the answer to your question there, please call the UST staff.

### UST Invoices for annual permit, assessment fees, or loan payments.

A reminder, please RETURN the invoice that was sent to you together with your check when making these payments. We want to make sure we credit the correct facility.

## Are we there yet? Still ignoring alarms after 11 years of training in Oregon

by Ben Thomas, UST Training, Inc.

*Those of you who have been in the petroleum business for more than a few years might remember Ben Thomas, who worked for the Vermont UST Program in the very early days of the program. He left Vermont in 1987 to join Alaska's UST Program. Today he runs UST Training, Inc.*

[www.usttraining.com](http://www.usttraining.com) a

*company that focuses on training UST operators, based in Washington State. In a recent UST Training newsletter Ben recounted a story that is sadly familiar: many of us working for the Vermont UST Program have experienced the same thing. Ben Thomas very kindly gave us permission to reprint his article:*

True story. Driving home from Oregon on a family vacation yesterday I stopped to get a fill up at a convenience store. And from my driver's seat I can see the Veeder Root tank monitor blinked red through the store window. Great. Not being able to help myself, I mention it to the supposed Class C UST operator filling up my car (Oregon is one of two mandatory full serve states):

**Me:** "Do you know what that alarm means?"

**Him:** "That red light? No idea. I know it's been like that a while. But I've only been here a few months."

**Me:** "So you don't know what it means?"

**Him, surprised:** "No, what?"

**Me, deadpan:** "It means your tank could be leaking."

**Him:** "Wow. That's bad."

**Me:** "Yes, mind if I take a look?"

**The good news:** I went inside and saw the alarm was "auto dial failure" which means the alarm system's connection to the Internet and (thus off-site monitoring) was malfunctioning. So there was no official or suspected leak alarm; however, the per-



son looking for alarms off-site would not have been able to get the warning in the first place. I ran a CSLD test print out and all 5 tanks passed the most recent 0.2 GPH leak test.

**The bad news:** The supposed Class C UST operator was not properly trained on this critical scenario. He had no idea what I was talking about regarding Class C operators, training or alarm response. Any other type of essential leak alarm would likely be missed and a suspected release would go unreported. I didn't see a training certificate on the wall of the office but I'm pretty sure I recognized the company name as a customer I would have trained in the past. Bummer.

**Questions:** How well trained are your class C operators to respond to an alarm condition? If you trained them yourself did you cover how to respond to your particular alarms? Ask them a few alarm or warning signals and see how they would respond. Or consider not relying on your own self-styled training and go with professionals, like us, who cover how [Class C UST operators should respond properly to alarms](#).

After having trained nearly every UST operator in Oregon these last 11 years I was hoping not to find this kind of knowledge gap at a very randomly picked UST facility. I'm hoping it was a fluke that I happened to visit the one site in Oregon with no Class C operators on site...but I'm not so sure.

**Your New Year's Resolution:** Make sure all of your Class C UST operators are properly trained!

Being mailed mid-March 2014 –

### ENVIRONMENTAL CHECKLIST



The checklist is a friendly reminder of testing dates for corrosion protection, product lines and line leak detectors

Lists the date your operating permit expires

Lists the A/B Operators for the facility with their certification expiration date.

### WHEN DO YOU NEED A CONSTRUCTION PERMIT?

A construction permit is required before the start of construction work at a facility.

You will need a construction permit for any of the following activities:

- ⇒ Replacing a Tank;
- ⇒ Replacing piping;
- ⇒ Adding a tank or piping line;
- ⇒ Replacing tank top sumps and or spill buckets (aka containment sumps) if the top of the tank and/or any portion of the piping is revealed by the breaking of concrete;
- ⇒ Adding or removing a piping manifold to two or more tanks.



The application for a construction permit is the Underground Storage Tank (UST) form that can be found on line at [http://www.anr.state.vt.us/dec/wastediv/ust/pubs/ust\\_form\\_5pg.pdf](http://www.anr.state.vt.us/dec/wastediv/ust/pubs/ust_form_5pg.pdf)

Complete all of the information including all tank information and in the *Construction Project Summary* on Page 5, please type or write a description of the work to be done. If your construction work involves breaking concrete, a site assessment will also be required.

The UST Program **requires at least 21 days** to process construction permits. Please bear that in mind when you are scheduling your work with the contractor.

State of Vermont - Peter Shumlin, Governor  
 Agency of Natural Resources - Deb Markowitz, Secretary  
 Department of Environmental Conservation - David Mears, Commissioner



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