INDIANA UNIVERSITY

OFFICE OF THE EXECUTIVE VICE PRESIDENT
FOR UNIVERSITY ACADEMIC AFFAIRS
University Environmental Health and Safety

Underground Storage Tank Management Program (UST's)

1. INTRODUCTION

1.1. Purpose

Indiana University Environmental Health and Safety (IUEHS) has developed the Underground Storage Tank Management Program to ensure conformance to the management and operation standard of the US Environmental Protection Agency 40 CFR Part 280 along with the Indiana Department of Environmental Management under 329 IAC 9.

1.2. Scope

This Program applies to regulated tanks and unregulated tanks as a matter of institutional environmental policy to the extent that it can reasonably be applied. Existing unregulated tank systems are grandfathered if the risk of leakage is considered negligible and if leakage detection is performed routinely. All tanks are included in each campus's Spill Prevention, Control, and Countermeasure (SPCC) inventory if applicable and any release from any tank requires reporting and clean-up. Note, regulated tanks are exempt from any other SPCC requirements as their regulation under the UST rule supersedes the SPCC requirements.

2. AUTHORITY AND RESPONSIBILITY

2.1. University Environmental Health and Safety (IUEHS) is responsible for:

- Obtaining and maintaining tank inventories and determining if tanks are unregulated or regulated. Unregulated tanks will also be addressed in the campus SPCC Plan if required;
- Responding to any releases or contamination remediation associated with these tanks;
- Facilitating tank closures and removals;
- Providing guidance for the installation of new tanks;
- Notifying regulatory agencies when there is a release of a regulated substance;
- Notifying IDEM when installing, purchasing, upgrading, temporarily closing, permanently closing, or performing a change-in-service for a UST;
- Investigating and confirming all suspected releases of regulated substances;
- Supervising a certified or licensed contactor to measure the presence of a released substance when one exists;
- Ensuring that required IDEM training is completed by the departmental owners;
- Maintaining records and correspondence related to tanks including audits, IDEM correspondence, spill and remediation records;
- Completing all abatement, site characterizations, and corrective actions after a release as required; and
- Periodically auditing departmental owners to assure compliance.

2.2. Departmental Owners: Departments with UST's are responsible for:

- Notifying IUEHS when installing, purchasing, upgrading, temporarily closing, permanently closing, or performing a change-in-service for a UST;
- Ensuring that UST systems meet performance standards for tank fabrication, corrosion protection, spill and overfill prevention equipment, operation, and release detection equipment;
- Ensuring that the company who installs, tests, upgrades, closes, removes or performs a change-in-service of a tank system is certified by the Indiana Fire Marshal;
- Ensuring that all leaks are reported as soon as possible and no later than 24 hours of a release;
  -report the release to IUEHS.

  -take immediate action to prevent any further release.

  -identify and mitigate fire, explosion and vapor hazards.

- Completing all requirements for closure and change-in-service;
- Providing assurance that financial resources are available for taking corrective actions in the event of a release;
- Maintaining records pertaining to leak detection, spills, product inventories, preventive and repair maintenance, upgrades, IDEM inspections and training; and
- Ensuring employees complete the on-line training provided by the Indiana Department of Environmental Management (IDEM).

2.3. University Architects Office is responsible for notifying IUEHS when tanks are specified, placed in the ground, upgraded or removed.

3. PROGRAM ELEMENTS

3.1. All UST systems must meet performance standards for tank fabrication, corrosion protection, spill and overfill prevention equipment, operation, and release detection equipment.

3.2. Daily monitoring, maintenance, and management of all UST systems must be performed according to manufacturer recommendations.

3.3. Records must be maintained for each tank of the following parameters:

- **3.3.1.** Product inventories
- **3.3.2.** All maintenance activities
- **3.3.3.** All changes to the tank system, including closure
- **3.3.4.** Any spills related to the tank and the associated response
- **3.3.5.** Any leaks detected from the tank and the associated response
- **3.3.6.** IDEM inspection reports
- **3.3.7.** Training of personnel
- **3.3.8.** IUEHS audits

3.4. Leak detection systems must be in place and functional at all times for all USTs.

3.5. IUEHS must be notified when installing, purchasing, upgrading, temporarily closing, permanently closing, removing, or performing a change-in-service for a UST.

3.6. Any leak or spill from a tank must be reported to IUEHS and cleaned up immediately. Fire, explosion, and vapor hazards may be present in these situations, necessitating the involvement of emergency response personnel.

3.7. Any inspection by IDEM must be reported to IUEHS immediately.

3.8. Persons who install, test, upgrade, close, remove or perform a change-in-service of a tank system must be certified by the Indiana Fire Marshal.

3.9. Employees must be trained according to the appropriate class – see Section 4: Training and Recordkeeping.

3.10. IUEHS will periodically audit departmental UST owners to ensure compliance.

3.11. All unregulated tanks using the consumptive on-site use exemption for fuel oil tanks will only be filled with #1 or #2 fuel oil in order to maintain the exemption. Diesel fuel use requires the registration of the tank as a regulated tank even if it is only used in the tank once.

4. TRAINING & RECORDKEEPING:

4.1. Training

UST facilities must designate individuals as Class A, Class B, and Class C operators for various responsibilities of system operations. Class A, Class B, and Class C operators must be certified in various aspects of system maintenance and operations. IDEM provides the required training and certification program for free. Departments can access the UST Operator Training Quick Start Guide via the IDEM website.

- Class A status is for individuals, such as owners, who hire or contract the personnel who are responsible for day to day maintenance and record keeping.
- Class B status is for individuals, such as consultants or full-time employees, who the facility owner has designated for the operation of all aspects of the system's operation and maintenance.
- Class C status is for facility employees, like cashiers, who assist Class A and Class B operators in monitoring for problems and responding to emergencies. Class C operators may be trained by the Class A or B for the facility or their designee.

All Departmental UST owners shall obtain the required IDEM on-line training for their personnel.

4.2. Recordkeeping:

All records as required by 329 IAC 9 will be maintained by the departmental UST owners. These include records those pertaining to tank specifications, leak detection, spills and clean-up/remediation, inspection records both internal and external (IDEM) and training. IUEHS will maintain records of all audits including those associated with emergency response and remediation and any compliance related records that they obtain.

5. REFERENCES

- **IDEM Underground Storage Tanks website**

- **329 IAC 9 IDEM UST regulations**
- **40 CFR 280 EPA UST regulations**
- **Consumptive on-site use exemption for fuel oil tanks**

6. REVISIONS

New Document - August 27, 2015

APPENDIX A – GLOSSARY

Consumptive use - with respect to heating oil, means consumed on the premises on which the tank is stored. The heating oil exclusion under IC 13-11-2-241(b)(2) does not apply to the storage of heating oil for resale, marketing, or distribution.

Heating oil - means

(1) petroleum that is No. 1, No. 2, No. 4-light, No. 4-heavy, No. 5-light, No. 5-heavy, and No. 6 technical grades of fuel oil;
(2) other residual fuel oils (including Navy Special Fuel Oil and Bunker C); and
(3) other fuels when used as substitutes for one (1) of the fuel oils listed in this section.
Heating oil is typically used in the operation of heating equipment, boilers, or furnaces. Diesel fuel is not heating oil.

Regulated tank system - a regulated tank system is any non-hazardous or non-wastewater tank system >110 gallons in capacity that is completely buried and does not meet qualify for the on-site consumptive use exemption for fuel oil tank systems.

Unregulated tank system - an unregulated tank system is one containing fuel oil for consumptive use on-site, usually associated with heating oil or generator fuel.