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Environmental, Health and Safety Services

## More on Underground Storage Tanks (UST) – Training and Management Standards

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SB989, a California law requiring UST upgrades and training of staff operating the tank went into effect January 1, 2000. We wrote to you about this law in February 2000 and again in September 2002. The new law required multiple upgrades on the tanks and monitoring systems and training of operators. Briefly, requirements are as follows:

- Testing of alarm systems and secondary containment (effective 1-1-01).
- Dispenser (for gasoline tank) containment (effective 12-31-03).
- New training standards and best management standards (effective 1-1-01)

The State Water Resources Control Board (SWRCB) was required to develop training regulations for UST owners/operators by 1-1-01. The SWRCB, a little behind, has finally got the regulations written and they are summarized as follows:

**What And By When:** By January 1, 2005, the tank owner declares to the local regulating agency:

- The tank(s) are in compliance with all underground storage tank requirements and
- The Designated UST Operator for the facility (see sample form enclosed).

### What Does the Designated UST Operator Do?

- Conduct monthly visual inspections of the underground storage tank. Results of each inspection are to be recorded and maintained (for at least 12 months) on site for review by the local agency inspector. Generally, the inspection entails looking for hazardous substances, water, debris, monitoring system functionality, system integrity on all sumps, under dispenser containment and fuel spill containers as well as monthly review of system alarm history.
- Provides annual training for facility employees starting July 1, 2005 and annually thereafter on proper operation and maintenance of the UST system. The training must be documented and the list of attendees and the training date available for review by the local regulatory agency staff. At least one of the trained employees must be on site during facility operation. Employee training will generally entail operation of the UST monitoring system, response to leaks and spills, contacts for emergencies and monitoring equipment alarms and operation of the UST system with the facility's best management practices. Training of employees cannot be delegated and must be performed by the Designated UST operator.

**Certification for Designated UST Operators:** The state requires that Designated UST Operators must be certified by the International Code Council following a test. The test involves answering 60 questions (closed book) over 1.5 hours on diverse issues covering UST operations and underlying regulations. The test is California specific with a passing score of 75% and tests are taken at a testing center. Details are available at [www.iccsafe.org/certificaiton/bulletin.html](http://www.iccsafe.org/certificaiton/bulletin.html) and click on "AST/UST (National and State specific)" or by calling (800) 423-6587. Needless to say, an individual would have to study regarding the regulations and the tank systems prior to taking the test.

**Who Can Become Designated UST Operators:** Any employee at the facility or a third party can be a Designated UST Operator. Since the tank must be inspected every 30 days and operator must be designated, any changes must be notified to the agency within 30 days. The level of burden on management is uncertain, as this is new stuff. If the dealership has a reliable tech savvy employee on the payroll willing to become a Designated UST Operator, internal management may be a good option. On the other hand sub-contracting, to an outside company that performs annual inspection for the alarm and dispenser on the UST, for a nominal fee maybe an option.

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**On the Horizon:** Research conducted by scientists at California EPA and UCLA at 850 gas stations in LA basin have found that alternative oxygenates replacing MTBE (that had caused the original brouhaha) would pose similar threats to groundwater contamination. The safest additive seems to be alcohol. How about that! *Need a drink, just get some groundwater!* Alcohol also seems to have some drawbacks – it is expensive, cannot be transported long distances after mixing with gasoline, and the tail pipe emissions aren't that great. The average cost of a leaking UST cleanup, according to the study, is from \$100,000 to \$1 million.

The study concludes that a complete new redesign of the current monitoring system is warranted. Also proposed are more effective management and high-tech leak detection techniques. Even though this study involved gasoline UST's only, new regulations may include waste oil and petroleum UST's as well.

So do you really want that gas tank? If the answer is yes, keep your wallet open and aspirin handy!

The article was authored by Sam Celly of Celly Services, Inc. Sam has been helping automobile dealers comply with EPA & OSHA regulations in California, Nevada, Arizona, Hawaii & Idaho since 1987. Sam received his BS & MS in Chemical Engineering followed by a JD from Southwestern University. Sam is a Certified Safety Professional & a Registered Environmental Assessor (CA). Your comments/questions are always welcome. Please send them to [sam@cellyservices.com](mailto:sam@cellyservices.com).