

Environmental Partnering Workshop 2006

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September 8, 2006

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Upgrade requirements for single wall tanks
and single wall pipe protected from corrosion

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- Overview
 - Regulatory requirements-tank removal...
 - Numbing statistics...
 - How EQD can help speed the process...
 - Regulatory requirements-installation...
 - How EQD observes the installation...
 - Summary

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- Chapter 62-761.510 Florida Administrative Code – Performance Standards for Category-A and Category-B Storage Tank Systems...
- “Pollution storage tanks and small diameter piping protected from corrosion on or before June 30, 1992, and all manifolded piping shall be upgraded with secondary containment” by December 31, 2009.

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- “all storage tank systems shall meet the performance standards of Rule 62-761.500, or be permanently closed in accordance with subsection 62-761.800(2) Florida Administrative Code.

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- 800(2)
 - Removing all liquids and accumulated sludges...
 - Disconnecting and capping, or removing, all integral piping. Manways shall be secured to prevent access...
 - Closing the storage tank in place in accordance with (this rule)...
 - Conducting a closure assessment in accordance with (this rule)...
 - Monitoring wells associated with closed systems that are not being used for release detection or site assessment...shall be closed in accordance with (this rule).

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- How many underground single wall tanks are there?
- Duval County
 - 954 single wall tanks requiring upgrade...

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- Northeast District – including Duval County...
 - 2,149 single wall tanks requiring upgrade...
- Statewide
 - 16,715 single wall tanks requiring upgrade.

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- According to the rule, closed or upgraded:
 - ***Tanks cannot be taken out of service!***
- If a contract is in place prior to the 2009 deadline, work must begin within 90 days after the date of the required upgrade.

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- **SPEEDING THE PROCESS:**
- 62-761.400 Notification...
 - At least 30 days before installation or upgrading to meet the requirements ...

unless the County agrees to a shorter time period...

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- The Environmental Quality Division will waive the 30 day notification requirement if:
 - *All necessary documentation has been provided and...*
 - *There is an inspector available to observe the tank removal.*

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- If this is what happens when an inspector is on site, we can only speculate what happens when there is no inspector present during the tank removal.

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- March, 2004...





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- This tank was not cleaned prior to the first attempt at removal...
- Free product and sludge spilled into the tank excavation...
- The activities were observed, photographed and documented by an inspector.





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- Work was delayed two days while a vacuum truck removed petroleum waste from the former tank pit...



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- The facility owner was required to file a Discharge Report Form and initiate site assessment activities...
- Although the facility was undergoing cleanup activities in an approved program at the time of this release, this discharge was treated as new and is currently active.

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- The facility owner was cited for a violation of 62-761.800(2)(a)1a: Failure to remove liquid and sludge from a tank prior to closure.

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- “Those who do not learn from history are doomed to repeat it”

August, 2006







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- Installations

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- **SPEEDING THE INSTALLATION PROCESS:**
- 62-761.400 Notification...
 - At least 10 days before closure to meet the requirements ...

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- How industry can speed the process:
 - Provide the 10 day notification as soon as possible after learning the bid has been awarded, ***even though the exact start date has not been determined...***
 - Follow all manufacturer's specifications for installation of tank components, the first time.



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- What owner/operators can do:
 - Check the contractor's references, not just his price...
 - Hire an experienced third party to oversee the work...
 - Do not allow unsafe work practices.

The End

