

Operator Training: A Letter from an Inspector



Dear Owners/Operators,

On August 8, 2011 the operator training requirement became effective and the inspection process will have a few new additions. For the first time, owners/operators will be held accountable for completing maintenance tasks that will help ensure a compliant facility.

Of the seven items covered under the Class A/B Operator log, I would like to highlight the top three deficiencies that are observed with regards to item No. 5 (routine operations and maintenance activities).

- **SPILL BUCKETS:** It's a common misconception that a spill bucket full of fluid is acceptable because it proves the bucket is "tight." While a full spill bucket does illustrate that the bucket is "tight," it also shows that the equipment is poorly maintained. As pointed out in operator training, spill buckets are not intended to hold fuel indefinitely. Full spill buckets will fail earlier and lead to costly repairs.

Remember to check and clean spill buckets after each delivery.

- **WATER IN SUMPS:** Make certain that excessive water has been removed and disposed of properly. Document the pump out on the A/B operator log or separate log to report the frequency of water management.
- **SHEAR VALVES:** Although these valves may have been installed one, two or 10 years ago, you simply cannot "set them and forget them." Bolts have a way of working loose or maintenance activities may have led to the removal of brackets. When checking under the dispenser, always remember to ensure that all anchor bolts and brackets are present and tight.

Remember, addressing these three issues will go a long way toward eliminating potential violations. For a complete discussion on item No. 5, refer to the "Operation and Maintenance" section of the operator training on-line tutorial.

One final note – S.C. UST Control Regulations R. 61-92, Part 280.35(i) states:

"Persons having primary responsibility and daily on-site operation and maintenance responsibility of underground storage tank (UST) systems (Class A and/or Class B Operators) shall repeat relevant facility-specific training if the tank for which they have such responsibilities is determined to be out of compliance with the requirements of this regulation."

This means that the LISTED Class A/B operator must be retrained on the specific deficiency found during the inspection. Retraining can be conducted on site during the time of the inspection ONLY if the LISTED Class A/B operator is present. For this reason, we strongly recommend an Class A/B operator be present during the inspection.

Todd Plating, DHEC Region 2 Environmental Quality Control (EOC) – UST Inspector

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Noteworthy Numbers: Confirmed vs. Closed (Update)

Lee Monts, UST Management Division

As of June 30, 2011, DHEC has confirmed 9,513 releases from underground storage tank (UST) systems. A confirmed release is one where levels of chemicals of concern are detected above laboratory detection levels. When these levels are above standardized risk-based screening levels, DHEC requires the owner/operator to conduct site rehabilitation activities in accordance with Subpart F of the S.C. UST

Control Regulations R. 61-92, Part 280 and the SUPERB Site Rehabilitation and Fund Access Regulations R. 61-98. Once all activities are completed satisfactorily, the release is closed and no further actions are necessary. Of the 9,513 confirmed releases, 6,801 or 71.5 percent, have been closed. The UST Management Division plans to give frequent updates to the number of confirmed releases and closures in future issues of this newsletter to show the progress that our staff and the regulatory community are accomplishing.

Notice of Fee Increase

On May 19, 2010, S.C. Legislature passed Bill H.3270 into law. The bill increases tank registration fees by \$100 per tank each year over four years until a cap of \$500 per tank is reached.

The tank fee will remain at \$500 per tank until \$36 million is generated into the State Underground Petroleum Environmental Response Bank (SUPERB) Account. Once the SUPERB Account is funded with the additional \$36 million, the fee will revert back to the original \$100 per tank.

The fee increase will help to cover eligible site rehabilitation expenses related to assessment and corrective action activities beyond the deductible provided through financial responsibility.

The law will go into effect on January 1, 2012, which will affect the invoice you receive in June 2012.

If you have any questions, please call Patti Ellis at **(803) 896-6840** or Eric Cathcart at **(803) 896-6847**.

The drums ... the drums!

Arthur Shrader, UST Assessment Section

In the classic Saturday calvary movie, the constant drumming in the distance eventually demanded the soldiers' attention. Similarly, tank owners and their rehabilitation contractors are being asked to deal with the drums of soil and groundwater stored at the facility. Typically, the troublesome drums are left at a former gasoline station and the current owner feels the drums are affecting their business. He/she wants the drums removed as soon as possible ... and small wonder.

Rumors that drums contained radioactive material have resulted in an investigation by the local television station. Recently, building inspectors have issued citations to the current facility owner requiring the removal of the drums from the site within 48 hours. The current facility owner became pretty upset since the drums were not his, but belonged to the former tank owner. Another facility owner was threatened with a lawsuit when a customer accidentally hit one of the drums as he pulled into the facility.

To avoid problems with drums left at a facility, several assessment contractors put the drums of groundwater in the back of their pickup trucks and remove them when they leave the site. Similarly, contractors are taking their impacted soil cuttings with them each day in trailers to the nearest landfill. Other contractors are placing the soil cuttings from the wells in a roll-off

container that is picked up the day the drilling is completed.

State and federal guidance require that soil cuttings and groundwater impacted by petroleum chemicals must be properly managed to avoid any leakage or spillage. Drums also must:

- have a label to identify the drums' contents;
- include the name of the generator of the impacted soil and water; and
- list the date the impacted soil or water was put in the container.

All containers of investigative-derived waste must be removed within 90 days.

However, while petroleum is not considered hazardous waste, benzene is – and petroleum contains benzene. Based on this fact, only one 55-gallon drum can be stored on site for no more than 30 days. This includes water and/or product from spill buckets, pump sumps and dispenser sumps. Otherwise, the owner/operator needs to contact the S.C. Department of Health and Environmental Control's Bureau of Land and Waste Management. Call the Hazardous Waste Permitting Section at **(803) 896-4000** for a storage permit.

Proper management and timely disposal of drums with impacted soil and groundwater will keep the current facility owner, city officials and others from drumming on you in the future.



Pictured are typical abandoned drum sites. Above are a number of containers left by the roadside. To the right, drums are left in a vacant lot of a closed business.



UST implements quality assurance program



Chris Doll, P.G., UST QAPP Coordinator, UST Management Division

In response to a requirement from the U.S. Environmental Protection Agency, the S.C. Department of Health and Environmental Control (DHEC) has developed the Underground Storage Tank (UST) Management Division Programmatic Quality Assurance Program Plan (QAPP).

The QAPP is authorized under Section 44-2-130(C)(1) of the State Underground Petroleum Environmental Response Bank (SUPERB) Act and Section II.A.1. of the SUPERB Site Rehabilitation and Fund Access Regulations, R.61-98. Full implementation of the QAPP began on July 1, 2011. All work directed by DHEC on or after July 1, 2011 is subject to the requirements of the QAPP.

The QAPP is a compilation of UST guidance and procedures that are, or

should be, currently occurring within the standard operating procedures of the site rehabilitation contractors working on UST releases. It is intended to provide a single performance standard for site rehabilitation activities at regulated UST sites, promoting quality and consistency from the assessment of releases through the completion of remediation. The QAPP applies to all releases from regulated USTs, those eligible for SUPERB funding and those that are not.

The QAPP is an important tool to document the type and quality of data needed to make environmental decisions and to provide a blueprint for the collection, verification and assessment of that data.

The QAPP will replace all of the UST Management Division's guidance documents related to assessment, corrective action, and the risk-based corrective action process.

Based on comments received from the UST contracting community, the original QAPP has been revised. Revision 1.0 is now posted on the UST Web page – www.scdhec.net/environment/lwm/html/ust.htm – along with lists of significant changes and answers to many questions.

The QAPP will have some effect on the cost of assessment and site remediation. A revised rate schedule that takes into account the requirements of the QAPP was posted for public comment in May 2011. It was finalized and posted on July 1, 2011.

Certified, Decertified UST Contractors

Underground storage tank (UST) contractors who are involved with routine investigative activities and interpretation of geologic data associated with releases from UST's must be certified in accordance with the S.C. Underground Petroleum Environmental Response Bank (SUPERB) Site Rehabilitation and Fund Access Regulations R.61-98. The following tables show newly certified contractors as of June 2011 as well as contractors who are no longer certified to conduct activities as defined by R.61-98. For a complete list of certified site rehabilitation contractors, visit www.scdhec.gov/environment/lwm/html/ust.htm.

NEW CERTIFIED SITE REHABILITATION CONTRACTORS		
PERMIT #	CONTRACTOR	DATE CERTIFIED
UCC-0411	TRC Environmental Corporation	05/04/2011
UCC-0412	Geologic Restoration, PLLC	05/09/2011
UCC-0413	Bradburne, Briller & Johnson, LLC	05/26/2011

DECERTIFIED SITE REHABILITATION CONTRACTORS		
PERMIT #	CONTRACTOR	DATE DECERTIFIED
UCC-0278	Aquaterra Engineering, LLC	01/27/2011
UCC-0273	MDM Services, Inc.	04/20/2011
UCC-0319	Nightingale Geologic Consultants	05/18/2011

Mehta named division director

Mihir Mehta is the new director of the S.C. Department of Health and Environmental Control's (DHEC) Underground Storage Tank Management Division.



Mehta joined DHEC in 1995 and worked as a project manager in the federal Superfund and Resource Conservation and Recovery Act (RCRA) corrective action programs within DHEC's Bureau of Land and Waste Management. Since 2006, he has managed the 303(d), TMDL and NPS Section in DHEC's Bureau of Water. Mehta began his new job duties on May 17.

Mehta has a Bachelor's Degree in civil engineering. He also has a Master of Science Degree in civil and environmental engineering from the University of South Carolina. He is a registered professional engineer and a certified public manager.

Notes from Permitting

Please call **(803) 896-6942** with any questions.

ISSUE: Double-wall piping for repair on existing systems

RECENT SCENARIO: There has been some confusion regarding the double-wall piping requirement as it pertains to piping repairs.

CORRECT PROCEDURE: If the piping repair work constitutes 25 percent or more of the piping run, then the entire piping run has to be replaced with double-walled piping.

ISSUE: Dispenser pans for suction systems

RECENT SCENARIO: A common question that has arisen is whether suction dispenser replacement requires a dispenser pan.

CORRECT PROCEDURE: If the dispenser replacement does not involve any connectors, risers or piping below the union or check valve, then a dispenser pan is not required.

ISSUE: Permit application completion

RECENT SCENARIO: The boxes for interstitial monitoring release detection methods for piping are being checked.

CORRECT PROCEDURE: These boxes require information as to how the monitoring will be done so a check is not a sufficient answer. Examples of appropriate responses would be "sensor" or "visual."

RECENT SCENARIO: The blank for the distance to the water line are still being completed with greater than 1,000 feet.

CORRECT PROCEDURE: It is important to remember that this question applies to not only wells and navigable waters, but also water lines going to your building. We are looking for a specific measurement for this distance.

RECENT SCENARIO: There has been some confusion about the turnaround time for having a underground storage tank (UST) permit approved.

CORRECT PROCEDURE: The UST Permitting Program is allowed three days to turnaround permit approvals. There have been many occasions in recent months of tank owners submitting a permit for immediate approval because they want to open the next day. In addition, there have been incidents where tanks were ordered and received on site and a permit application had not been submitted yet. Therefore, the tanks could not be installed. Please keep in mind this three-day turnaround schedule when submitting an application.



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Newsletter printed on **RECYCLED** paper.

OR-0984 7/11

Return Service Requested

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