

from experience

environmental, health & safety edition

Compliance Deadline Approaches for UST Rule Changes

In July 2015, the United States Environmental Protection Agency (USEPA) published new regulations on Underground Storage Tanks (USTs) containing petroleum-based or hazardous substances [40 CFR 280], which added various new operation and maintenance requirements. While these regulations became effective 10/13/2015 with a compliance deadline of 10/13/2018 for most previously installed systems, the site-specific compliance deadlines are dependent upon the type and equipment setup of tank installed, date when installed, etc., and now also include USTs that store fuel for emergency generators. These regulation changes include, but are not limited to:

- Required agency notifications when acquiring a UST or before switching to certain biofuel blends.
- Regular operability testing and inspection of overfill prevention equipment, secondary containment sumps, and release detection equipment (e.g., probes, sensors, and automatic line leak detectors), and also after making repairs to spill or overfill prevention equipment and secondary containment areas.
- Facilities must conduct 30-day and annual walkthrough inspections. (Records of the walkthrough inspections must be kept on file for at least one year.)
- All facilities with systems storing certain regulated substances must maintain records demonstrating compliance with the specific compatibility requirements.
- Added operator training requirements.
- Specific secondary containment requirements when installing or replacing tanks and piping.

For more detailed or state-specific information and navigation, please refer to the following link to the USEPA's Underground Storage Tank home page which summarizes these Regulation Revisions:

<https://www.epa.gov/ust/revising-underground-storage-tank-regulations-revisions-existing-requirements-and-new>

experience in brief

As the annual July 1 reporting deadline approaches for the USEPA SARA 313 Toxic Release Inventory (TRI) for chemicals, keep in mind the inclusion of Ozone (O₃) into threshold calculations (e.g., used for filler or post-filtration water disinfection). In most cases, the amounts of Ozone generated and used at GMP facilities is low and unlikely to exceed the TRI reporting thresholds. However, Ozone should still be included within annual reporting threshold calculations, or at least identified if determined to be negligible based on usage, ozone generator capacity, etc.

continuing education

Hixson associates regularly participate in continuing professional education events across the country. To learn more about the events listed below, e-mail Hixson at: info@hixson-inc.com

Ohio Bureau of Workers Compensation, "Machine Guarding Basics" and "Lockout/Tagout and Safety-related Work Practices"
March 2018

Manufacturers' Association Council's "27th Annual Sustainability and Environmental, Health & Safety Symposium"
March 2018

Food Industry Environmental Council's "48th Annual Food & Beverage Environmental Conference"
Albuquerque, NM
March 2018

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