

# Oil Pollution



# Virginia Above Ground Storage (AST) Tank Regulations

# Above Ground Storage Tank Regulations

- Almost Identical with EPA's Oil Pollution Prevention Rules
- SPCC can be satisfied with Va. Oil Discharge Contingency Plan and vice-versa with minor differences (mostly formatting)
- SPCC must be a stand alone document

# Above Ground Storage Tank Regulations

- Updated and amended in 2012
- Provides some relief from rules

# Above Ground Storage Tank Regulation Changes

- Revisions primarily to clarify language
- Daily walk through inspections not required when plant not operating
- When operating must do visual inspection every 14 days vs. daily
- Double walled tanks not subject to inventory controls and testing
- Double walled buried piping also exempt

# 25,000 Gallon Aggregate Storage Exemption

- Tanks less than 660 gallons not counted
- Oil stored in equipment not counted
- Liquid AC not counted
- If below 25,00 gallons, Pollution Prevention provisions not required
- ODCP still required (SPCC issue)

# Professional Engineer Certification

- Required for secondary containment or another method approved by the Board
- Can be certified by other than a PE if approved by the Board
- Containment capability must be reviewed and re-certified every 10 years

# Professional Engineer Certification (Cont.)

Certification must include at a minimum the following statement:

“Based on my evaluation, I hereby certify that each secondary containment structure is in compliance with 40 CFR 112 (EPA Oil Pollution Prevention) and the Uniform Statewide Building Code”





## Virginia Asphalt Plant Environmental Reports Oil pollution

<u>Program/Permit</u>	<u>Report Type</u>	<u>Preparation Timeframe</u>	<u>Location of Report</u>
• AST Registration	DEQ Form 7540-AST	Renew Every 5 years	DEQ/Plant
• Tank Upgrades, New Tanks Tank Relocations, Closures	Written Notification (DEQ Form 7540-AST)	Within 30 Days	DEQ/Plant
• Oil Discharge Contingency Plan (Not required if < 25,000 gallons)	Written Plan	Renew Every 5 years	DEQ/Plant
• SPCC Plans (EPA))	Written Plan (PE Cert.)	Update by November, 2011	Plant

Virginia ASTs - The following requirements apply if the facility has an aggregate storage capacity of 25,000 gallons or greater (less AC tank capacity): If asphalt tanks are co-located w/ other fuels inside containment, the other fuel tanks may be subject to the requirements shown below Under this scenario, AC tank volumes can't be subtracted out to meet the 25,000 gallon threshold. Records must be kept for 5 years.

• Pressure Test Lines*	API 570 Piping Test	Every 5 years	Plant
• Visual Inspections *	Record of Inspection	Daily Walkthrough (when operating)	Plant
• Inspections *	Inspection Checklist**	Weekly (when operating)	Plant
• Training**	Info and Procedures	Current	Plant
• Inventory/Leak Detection*	Inventory Records (Each Tank)	Continuous	Plant
• Oil Spills $\geq$ 25 Gals. (or spill reaches state waters)	Notify DEQ, Clean up & Record Actions	Immediate	Plant
• Oil Spills < 25 gallons	Clean up, Document Incident	Each Occurrence	Plant
• Financial Assurance	Written Report	Update Annually	Plant
• Secondary Containment*	P.E. Certification	Tank Installment & every 10 years	Plant

\* Excludes AC Tanks

\*\* Minimum of 13 items to cover (see 9 VAC 921-91-10 – P. 25) and Plant Inspector must be trained initially plus every 3 years thereafter.

# Common Violations

- Lack of an SPCC Plan (or can't find it)
- ODCP not updated with latest changes
- Not signed by PE and/or manager
- Lack of training
- No record of daily and weekly inspections

