How to Maintain ‘Seasonal Tanks’

By Eric F. Cathcart
UST Management Division

Across South Carolina, there is a small population of underground storage tanks (USTs) that are used to store product that is sold only during certain months of the year. Within the industry, these tanks have commonly been referred to as “seasonal tanks.”

For such tanks, owners typically stop selling and receiving deliveries for a few months. One such example is a kerosene UST where product is primarily sold during the colder months. Another example may be a small marina, which is typically closed during the colder months.

In the off-season months, it can be difficult for an owner or operator to keep enough inventory for an automatic tank gauge (ATG) to conduct proper testing. Most often, this leaves them without viable monthly release detection. During this time period, owners have only two options in order to maintain regulatory compliance: 1) pump the tank to less than 1 inch and maintain that level; or 2) utilize another approved method of monthly release detection that can work with low product levels.

Remember, even if tanks are emptied, the requirements for annual registration fees, financial responsibility, and cathodic protection testing/maintenance still apply.

S.C. UST Control Regulations offer several alternative methods of conducting monthly release detection. These can be found under R.61-92, Section 280.43, Methods of Release Detection for Tanks, options (d)-(i).

If you are faced with the difficulties with ATGs during periods of low levels or have questions about other methods of release detection, call John Morgan with the UST Management Division at (803) 898-0602 or the UST Management Division at (803) 898-0589.

Dispensers Shortcut Is Bad for Shear Valves

By John E. Morgan III

There are a large number of new dispensers being installed across the state and that is a good thing. Newly installed dispensers equate to containment sumps and hopefully fewer releases to the environment.

Some new dispensers, however, may not prevent a release if they are installed incorrectly. For instance, some dispensers are not being anchored according to industry standards and manufacturer’s specifications.

New dispensers should be anchored to the concrete dispenser island as intended by the manufacturer. Each new dispenser is designed with predetermined anchoring hole locations. The anchoring holes are designed to provide access to the top of the concrete dispenser island where bolts (typically lag bolts with concrete shields) should be installed directly into the concrete to firmly hold the dispenser in place.

The “shortcut” way to improperly install dispensers involves directly connecting the shear/impact valve anchoring assembly to the dispenser. In the top right photo, a piece of uni-strut is used to make contact with the interior of the dispenser housing on both sides. Then the threaded rod is bent into a hook and used to “tie down” the dispenser to the shear valve stabilizer bar. In the second photo (bottom right), you can see the same idea was used, but the threaded rod is attached to the upper horizontal runner of the sump uni-strut where the shear stabilizer bolts and uni-strut nuts are installed.

The issue with this dispenser shortcut tie-down method involves the integrity of the shear valve anchoring system. It is very important for shear valves to be rigidly anchored to the concrete island. No manufacturer – even when their equipment is installed exactly as designed – can guarantee it will hold the lower portion of the valve in place when a vehicle hits it with unknown speeds, angles, etc. Adding the weight of tying down a new dispenser is not beneficial to the design. No shear valve anchoring system is designed or intended to hold both the dispenser and the shear valve(s) in place.

Installing dispensers using this shortcut may prevent a shear valve anchoring system from performing as designed. So make sure your new dispensers and shear valve anchoring systems are properly installed the way the manufacturer intended.

If you have questions, contact John Morgan at (803) 898-0602 or the UST Management Division at (803) 898-0589.

The Drums, The Drums

By Art Shrader

UST Management Division

(Arthur “Art” Shrader worked with the UST Management Division as a geologist and division director for almost 20 years until his passing in June 2014. He will be remembered in the industry for his knowledge of petroleum assessment and remediation techniques and his kindness to all those he encountered. This article is a reprint in honor of his contributions to the people of South Carolina.)

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 gas station and the current owner feels the drums are affecting their

Continued on the following page
Drums, continued

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 a local television station. Building inspectors have issued citations to a facility owner requiring the removal of drums from the site within 48 hours. The 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 be properly managed to avoid any leakage or spillage and also be labeled to identify the drums’ contents, the name of the generator of the impacted soil and water and the date the impacted soil or water was put in the container. All containers of investigation derived waste must be removed within 90 days.

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.

Notes from Permitting

TOPIC: Installation Requirements
NOTES: Please remember when sumps are located under dispensers and submersible pumps, they must be monitored either by sensors or visual monitoring and a monthly written log must be maintained. The piping that enters the sump must be open to allow liquid to flow into the sump to reach the correct level of leak detection.

TOPIC: Permitting Time Frames
NOTES: As a reminder, permits to install and operate are typically approved within three business days, once all of the required information is submitted to DHEC and deemed as complete and accurate. If the facility is located in one of the eight coastal counties (Beaufort, Berkeley, Charleston, Colleton, Dorchester, Georgetown, Horry, or Jasper), DHEC will forward all permitting information to the Office of Ocean and Coastal Resource Management (OCRM) for review and approval. This may take an additional few days to process. Please plan tank deliveries, installations and store opening dates accordingly.

TOPIC: Online Operator Training
NOTES: The FREE online training program is now operational. If you are associated with a facility, you must enter the permit number to register. If you are a third party and not associated with a facility, check the appropriate box. Please be aware that all operators are required to complete the first seven modules as well as those modules related to the specific equipment at their facility. Once testing results have been reviewed by the UST Management Division, certificates are issued manually to the operator.

TOPIC: Financial Responsibility
NOTES: Most tank owners and operators are aware that financial responsibility must be maintained while they are operating their UST systems. According to South Carolina UST Control Regulation, R.61-92, Part 280.113, an owner or operator is no longer required to maintain financial responsibility for an UST after the tank has been properly closed or, if corrective action is required, after corrective action has been completed and the tank has been properly closed. Therefore, if the UST system has been properly closed but a release is confirmed, the owner/operator is required to maintain financial responsibility until the Superfund deductible of $25,000 has been met for eligible and qualified releases. Call John Mize at (803) 898-0609 or e-mail Mizeje@dhec.sc.gov with any questions.

NEW CERTIFIED SITE REHABILITATION CONTRACTORS

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DECLERIFIED SITE REHABILITATION CONTRACTORS

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