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POSITION PAPER - UST COMPLIANCE

Date: October 9, 2020

Subject: Permanently Out of Service (POS) Sacrificial Anode systems not tested/maintained in accordance with SC UST Control Regulation, R.61-92, Part 280, Section 31

Regulation background/history: South Carolina UST Control Regulations, R.61-92, Section 280.31(b)(1), requires USTs and piping equipped with cathodic protection systems be tested at least every three (3) years for proper operation. The testing and maintenance of these systems are required to ensure continuous protection from corrosion on steel UST systems in accordance with Section 280.31. The three (3) year testing allows for issues to be identified and repaired in a manner as to maintain the integrity of the systems.

Discussion: In accordance with the South Carolina Underground Storage Tank Control Regulations, R.61-92, Section 280.31(a), if a UST is equipped with a Sacrificial Anode cathodic protection system, it must be operated and maintained to continuously provide corrosion protection. According to Section 280.70, if tanks become classified as substandard in accordance with Sections 280.20 and 280.21, as a result of not providing continuous corrosion protection, they must be permanently closed. In an effort to aid tank owners, options below have been provided.

Options: If a system has been classified as out of compliance then one of the following two options must be used to meet the compliance requirements of Sections 280.20 and 280.21:

1. The tanks may be permanently closed. In order to meet the requirements of this option, a written notification of closure must be submitted for approval. Upon permanent closure of the UST(s), an environmental assessment (sampling) must be conducted. A report of the findings (closure report) must be submitted within sixty (60) days after the tanks have been closed.
2. The tank(s) may be brought back into compliance after conducting a series of tests to ensure that the tank(s) are still viable. The UST(s) may have a Sacrificial Anode cathodic protection test completed. If the test passes the system may remain in service. If the tank fails the Sacrificial Anode cathodic protection test, it must be inspected using procedures outlined in American Petroleum Institute API 1631 or National Leak Prevention Association NLPA 631, Chapter C, to ensure the integrity of the metal thickness as required by Section 280.21(b)(2)(iv). If the integrity test passes, conduct a tank tightness test on the UST(s). If there is a passing result on the metal integrity and tightness test, then the cathodic protection system must be repaired and retested.

Note: If the tank fails the metal integrity test, the UST(s) must be permanently closed in accordance with Subpart G of the UST Regulations. If the metal integrity test passes, but tank fails the tightness test, make any necessary repairs to the tank in accordance with manufacturer's instructions or an accepted Code of Practice and conduct another tightness test. After passing tightness testing, if the cathodic protection system test fails, make any necessary repairs to the system in accordance with manufacturer's instructions or an accepted Code of Practice and conduct another cathodic protection system test to verify functionality.