

OPERATING AN UNDERGROUND STORAGE TANK VIGILANCE, TECHNOLOGY ARE KEY

IF YOU HAVE have an underground storage tank (UST), you're not alone. According to the U.S. Environmental Protection Agency, there are approximately 630,000 active USTs¹ in the United States. Of these, 75 percent are in "significant operational compliance" with spill, overfill, and corrosion protection requirements for release prevention. In addition, 71 percent are in compliance with regard to leak detection requirements, and 63 percent of UST facilities are in compliance with both the release prevention and leak detection requirements.

The bad news: There's a lot of room for improvement. And a leak of any kind can result in petroleum or another hazardous substance seeping into the soil and contaminating groundwater (i.e., drinking water) or presenting other potential health and environmental risks.

While there are a number of potential sources of leaks, a recent Florida Department of Environmental Protection study by Marshall Mott-Smith examined seven years of comprehensive data and identified the four most common sources:

- Spill buckets (48 percent)
- Piping (14 percent)
- Dispensers (12 percent)
- The tanks themselves (10 percent)

Preventing Releases

The good news is that there are proactive steps you can take to prevent leaks, spills, and corrosion from your underground storage tank. Khan Adams, a claims manager with Great American Custom, highlighted five key steps to smart risk management:

1. **Rely on your systems.** Adams told *Public Domain* that "operators should watch their inventory on a daily basis. Those who are good at doing this will either find they are not losing gas or, if they do have a leak, respond quickly." The result: Minimal loss and minimal cleanup costs.

2. **Put bells and whistles in place.** "There are a lot of tools that, if working properly, will help prevent a release or, at least, detect it early," says Adams. These include automatic tank gauges, cathodic protection, and tank and sump sensors.
3. **Inspect your systems daily.** "There's no substitute for doing your homework," says Adams. "Walk around, pull the covers, and make sure nothing sprays up at you."
4. **Train your employees.** Adams points out that every employee, whether a cashier or a manager, should be trained to monitor your underground storage tank. "Vigilance and early detection provide you with a certain amount of protection," he says.
5. **Keep records.** Federal law requires that operators of underground storage tanks keep records, including records on repairs and

The U.S. EPA details several warning signs that a release has occurred²:

- You (or your co-workers or customers) smell escaped product or see anything like an oily sheen on water near your facility.
- Your neighbors complain of vapors in their basement or about water that tastes or smells like petroleum.
- Someone reports unusual operating conditions at your facility, such as a dispensing pump behaving erratically.
- You receive or generate results from leak detection monitoring and testing that indicates a leak.

If there is a release, Adams stresses that you need to "take care of the immediate problem first." This includes turning off the pumps, calling the fire department (if necessary), and putting out absorbent material such as kitty litter or booms.

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upgrades, inspection and test results for your cathodic protection system, and an expert's analysis of the corrosion potential of the site if corrosion protection equipment is not used. Adams recommends that UST operators also keep daily records of their inspection activities, which will help you prove to your insurance company (and any parties that might sue you for cleanup costs) that you've done your due diligence and have been operating your UST responsibly.

Reporting Spills

Of course, all the best prevention practices in the world are no guarantee that a spill or leak won't occur. Accidents happen.

Next, you must notify your state regulatory agency that a release has taken place.

Once you've notified your state agency, you should call your insurance company. You will need to retain a consultant to assess and possibly remediate your site, and your insurance company can help you locate the right firm, vet credentials, and consent to using that firm (so you'll know that the costs will be covered under your policy).

Finally, it's useful to refer back to the U.S. EPA, which states simply that USTs must be "protected from spills, overfills, and corrosion." The EPA adds that "spills and overfills result

mainly from bad filling practices. Also, unprotected steel tanks and piping can corrode and release product through holes caused by corrosion of the steel tank and piping.”

In other words, releases have identifiable causes —and defined

solutions that can help prevent an accident from occurring. The bottom line is that putting in place smart risk management strategies can go a long way to prevent problems from occurring and to protect you from lawsuits should you have a UST release. ◆

Public Domain thanks Khan Adams, Claims Manager, Great American Custom, for his assistance: 49 E. 4th Street, DTS-300, Cincinnati, OH 45202; tel: 513-763-7134; e-mail: khan.adam@gamcustom.com.

¹ Statistics valid as of September 2007.

² “How Can I Tell If a Release Has Occurred?” U.S. Environmental Protection Agency, Office of Underground Storage Tanks. Available at <http://www.epa.gov/OUST/faqs/faq4a.htm>.

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