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 25,000 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
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”
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<th>Report Type</th>
<th>Preparation Timeframe</th>
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<tr>
<td>AST Registration</td>
<td>DEQ Form 7540-AST</td>
<td>Renew Every 5 years</td>
<td>DEQ/Plant</td>
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<td>Tank Upgrades, New Tanks, Tank Relocations, Closures</td>
<td>Written Notification (DEQ Form 7540-AST)</td>
<td>Within 30 Days</td>
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<td>Oil Discharge Contingency Plan (Not required if &lt; 25,000 gallons)</td>
<td>Written Plan</td>
<td>Renew Every 5 years</td>
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<td>Written Plan (PE Cert.)</td>
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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 with other fuels inside containment, the other fuel tanks may be subject to the requirements shown below. Under this scenario, AC tank volumes cannot 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 ≥ 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