

SPECIAL EDITION

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EPA Amends SPCC Regulation for Aboveground Oil Storage Tanks

On November 21, 2008, the Environmental Protection Agency amended the Spill Prevention, Control and Countermeasure rule for aboveground oil storage tank systems to provide increased clarity, to tailor requirements to particular industry sectors, and to streamline certain requirements for facility owner/operators subject to the rule.

Included among the changes was an amendment to paragraphs 112.8 (c) (6) and 112.12 (c) (6) to provide flexibility in complying with the bulk storage integrity testing requirements. Specifically, EPA is modifying the provisions to allow an owner or operator to consult and rely on industry standards to determine the appropriate qualifications for tank inspectors/testing personnel and the type and frequency of integrity testing required for a particular container size and configuration.

The previous July 2002 rule required a visual inspection coupled with some other form of testing. The amendment allows the owner to determine the frequency and type of testing and inspection that are appropriate, according to site specific conditions, while also considering relevant integrity testing standards.

Within the rule commentary, EPA mentions that industry standards are technical guidelines created by experts in a particular industry for use throughout that industry. Such guidelines assist in establishing common levels of safety and common practices for manufacture, maintenance, and repair. Created by standard-setting organizations, inspection standards, such as the STI SP001 Standard for Inspection of Aboveground Storage Tanks, provide differentiated inspection requirements for containers of various sizes and configurations that also allows for visual inspection of smaller containers.

The EPA amendments to the SPCC allow such industry standards to be used without the need for environmental equivalence. EPA notes that although the use of standards is voluntary, but *when the standard is incorporated into a facility's SPCC Plan, adherence to that standard is mandatory* for implementation of the SPCC Plan.

For further information of the Amendments and all of the other requirements, go to the EPA website.

For further information on the STI SP001 Standard for Inspection of Aboveground Storage Tanks, go to the STI/SPFA website.

STI/SPFA Releases SP031 Standard, 4th Edition

After 18 months of study and revisions by a broad-based committee of experts, STI/SPFA announced November 24, 2008 that the newest edition of standard SP031, now known as "Standard for Repair of Shop Fabricated Aboveground Tanks for Storage of Flammable and Combustible Liquids," is available. The SP031 Standard is a companion to STI's SP001 Standard, "Standard for the Inspection of Aboveground Storage Tanks."

The group's effort completes a cycle of standard-making revisions that was unanimously approved by the balanced committee in late-October. The process began in 2006 when STI announced a request for participants to join the committee whose purpose was to review the standard. The 21-member committee consisted of:

- STI tank fabricators;
- federal and state regulators;
- bulk storage tank owners;
- representatives of tank repair companies; and
- other interested parties.

STI/SPFA would like to acknowledge the individual contributions of L. Sam Lillard who managed the AST program for the Commonwealth of Virginia. Unfortunately, Lillard passed away last month. STI/SPFA is most grateful for his considerable contributions to both the SP031 Standard and the SP001 Standard.

Greg Bareta, P.E., of the Storage Tank Regulation Section - Wisconsin Department of Commerce, recently told Dana Schmidt, STI/SPFA Staff Liaison to the Committee:

It was an honor and a pleasure to work with such a fine group. I greatly

appreciate having such a well-thought-out standard that we can reference

to ensure the public and environment are well protected.

The revised SP031 Standard incorporates expanded details of methods for modifications and repairs to shop fabricated tanks, including:

- Methods for addressing a tank with flanged and dished tank bottom, also referred to as knuckle joints;
- Allowable distances between patch or insert plates and existing weld joints; and
- Checklists for documenting repairs and modifications.

SP001 covers the requirements for inspection of tanks; whereas, SP031 covers repairs that may be required as a result of these inspections.

To order the 4th edition of the SP031 Standard (Doc. No. 700-50-5010), please contact STI/SPFA by phone at 847/438-8265 or consult its Publications Index at <u>www.steeltank.com</u>.

SP001 Standard for The Inspection of Aboveground Storage Tanks, 4th Edition issued July 2006, Doc. No. 700-50-5016, is also available from STI/SPFA by phone or on the Publications Index at <u>www.steeltank.com</u>.

The standards may be purchased together at a small savings (Doc. No. 700-50-5017).

This special issue of *Tank Talk* was published November 25, 2008, and made available to subscribers of *Tank Talk* to inform them of the release of SP031 Repair Standard and the Amendment of the EPA SPCC Regulation for Aboveground Oil Storage Tanks.