
CITY AND COUNTY OF DENVER
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ENVIRONMENTAL MANAGEMENT SYSTEM

Storage Tanks Requirements

Title:	Storage Tanks Requirements
Document Identification Number:	CCD-203.10
Version:	3.0
Revision Date:	September 12, 2008
Document Owner:	Storage Tanks Program Manager (Paul Bedard)
Controlled Copy Location:	Not applicable.

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1. Overview

This Storage Tank and Spill Requirements Registry details the legal and other requirements (such as permits and plans) that the City and County of Denver (CCoD) is subject to on the Federal, State and local level. It is intended to outline these requirements from their source (such as the United States Code) to specific documents and actions that must take place in order to meet the requirements (such as permits, compliance reporting, and record keeping).

There are many aspects, including routine activities or items, at CCoD facilities that have the potential to impact storage tanks and petroleum management. These aspects are identified in the most recent version of Environmental Aspects and Impacts Assessment.

To address the legal and other requirements created by these aspects, CCoD operates the following programs:

1. Active Storage Tank Program (addresses safe petroleum storage, delivery and distribution/dispensing);
2. Municipal Facility Compliance Program (addresses compliance for air, stormwater, hazardous waste, etc.); and
3. Environmental Stewardship Program (addresses proactive means of reducing environmental impacts)

Additionally, CCoD has created and published several Environmental Guidelines (EGs) to assist in controlling the aspects referenced above to minimize impacts to storage tanks and spills. A list of EGs can be found in the Environmental Guideline Process and Catalog.

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2. Applicable Regulations & Other Requirements

NAME	REGULATOR	CITATION	APPLICABLE PROGRAM	CCoD RESPONSIBLE PERSON
Clean Water Act (CWA)	EPA	33 USC 1252	Active Storage Tank Program	Paul Bedard
Spill Prevention Control and Countermeasure	EPA	40 CFR 112.1 –112.8	Municipal Facility Compliance Program	Paul Bedard
Energy Policy Act of 2005	EPA/DOE	Public Law 109-58		
Federal UST Regulations	EPA	40 CFR 280 – 281 & 282.55	Active Storage Tank Program	Paul Bedard
Colorado Fuel Products (LPG) Statutes	CDPHE	8 CRS 20	Municipal Facility Compliance Program	Paul Bedard
Colorado Petroleum Storage Tanks Statutes	CDPHE	8 CRS 20.5	Active Storage Tank Program	Paul Bedard
Colorado Petroleum Storage Tanks Regulations	CDPHE	7 CCR 1101-14	Active Storage Tank Program	Paul Bedard
Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)	EPA	42 USC 9601	Municipal Facility Compliance Program	Paul Bedard
Executive Order 109	CCoD	XO 109	Active Storage Tank Program	Paul Bedard Gary Lasswell

3. Applicable Permits, Plans and Procedures

NAME	REGULATORY DRIVER	PHYSICAL LOCATION	EFFECTIVE DATE	RENEWAL DATE	CCoD RESPONSIBLE PERSON
Service Station /Dispensing Permit	Denver Fire Code	Facility files	Varies	none	Fleet Maintenance
Annual Line Tightness Testing	Colorado Petroleum Storage Tank Regulations	Facility files			Paul Bedard

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Annual ALLD testing	Colorado Petroleum Storage Tank Regulations	Facility files			Paul Bedard
Monthly AST inspections	Colorado Petroleum Storage Tank Regulations	Facility files			Paul Bedard
Monthly UST inspections (~2009?)	Colorado Petroleum Storage Tank Regulations	Facility files			Paul Bedard
Tank Systems Technician certification (2009?)	Colorado Petroleum Storage Tank Regulations	Facility files			Paul Bedard
Tank Registrations/Permits	Colorado Petroleum Storage Tank Regulations	Facility files	Varies	Annually (February)	Paul Bedard
Spill Prevention, Countermeasure and Control Plan (SPCC)	Federal Oil Pollution Prevention Regulation	Facility files	Varies	5 year up-date	Paul Bedard

4. Reporting Requirements

NAME	DRIVER/ GUIDANCE	FREQUENCY	RECIPIENTS (& ADDRESSES)	REQUIRED SIGNATURE	PHYSICAL LOCATION	CCoD RESPONSIBLE PARTY	INSTRUCTIONS
Semi-annual reports (future ~2009?)	Colorado Petroleum Storage Tank Regulations	2 / year	CDLE	yes	Facility files	Paul Bedard	State regulations
Automatic Line Leak detector testing for dispensing facilities	Colorado Petroleum Storage Tank Regulations	annual	Hold in facility files		Facility files		None
Cathodic Protection Testing	Colorado Petroleum Storage Tank	1 / 3 years	Hold in facility files		Facility files	Paul Bedard	None

(passive)	Regulations						
Line Tightness testing	Colorado Petroleum Storage Tank Regulations	Annual	Hold in facility files		Facility files	Paul Bedard	None

5. Sampling, Inspection, Monitoring and Record Keeping Requirements

NAME	DRIVER/ GUIDANCE	REQUIRED FORM OR CHECKLIST	FREQUENCY	DEQ RESPONSIBLE PARTY	RECORDS RETENTION INSTRUCTIONS
Automatic Line Leak detector tests for dispensing facilities	Colorado Petroleum Storage Tank Regulations	No	annual	Paul Bedard	Hold records for as long as necessary to prove /disprove allegations of leakage and subsurface contamination- a long time. Lifetime – of facility; until documented clean closure
Line Tightness tests for any liquid filled buried lines	Colorado Petroleum Storage Tank Regulations	No	annual	Paul Bedard	Hold records for as long as necessary to prove /disprove allegations of leakage and subsurface contamination- a long time. Lifetime – of facility; until documented clean closure
Cathodic protection tests	Colorado Petroleum Storage Tank Regulations	No	3 years (for passive systems, or 6 months for galvanic systems)	Paul Bedard	Hold records for as long as necessary to prove /disprove allegations of leakage and subsurface contamination- a long time.

					Lifetime – of facility; until documented clean closure
Monthly (or continuous) UST leak detection by Inventory Reconciliation, CSLD, daily manual stick gauging.	Federal Regs and Colorado Petroleum Storage Tank Regulations	Yes, electronic data format from Veeder Root System	Monthly at minimum	Paul Bedard	Hold records for as long as necessary to prove /disprove allegations of leakage and subsurface contamination- a long time. Lifetime – of facility; until documented clean closure
Monthly AST visual inspections	Colorado Petroleum Storage Tank Regulations	Yes City Specific monthly visual form	monthly	Paul Bedard	12 months minimum.
AST ullage reporting	Colorado Petroleum Storage Tank Regulations	Yes, City Specific report form	Event based- anytime petroleum is delivered to a tank	Paul Bedard	6 to 12 months minimum

6. Training Requirements

NAME OF TRAINING	DRIVER/ GUIDANCE	FREQUENCY	DEQ RESPONSIBLE PARTY	RECORDS RETENTION REQUIREMENTS
SPCC training	SPCC Regulations at 40 CFR 112	annually	P. Bedard . D. Brown (agency trainer) plus specific assigned facility compliance staff	Complete Training log addendum to each SPCC plan
Storage tank installer certification (this training will be a requirement of contractors we hire for service- written into the contract with the City.)	State tank regulations 7 CCR 1101-14	Likely just once	P. Bedard, G Lasswell	Unknown
Storage Tank Technician Certification (future ~2009)	State tank regulations 7 CCR 1101-14	Unknown at this time	P. Bedard, G Lasswell	Unknown 3 yrs (or consistent with other training records management requirements in other EMS docs!)

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