

ST.GERMAIN & ASSOCIATES, INC.

presents

## Compliance Triggers: The Devil's in the Details



# Underground Storage Tanks (USTs)

- Register new tanks, notify DEP/DES of change of ownership, major change or repair
- Annual testing (by July 1 ME)
  - Leak Detection
  - Line Leak Detection
  - Overfill Prevention
  - Spill Buckets
  - Stage I
- Spill buckets clean



# UST Inventory Monitoring

- Daily Inventory – reconcile measurement against pump meter readings
- Annual Statistical Inventory Analysis (must have good data!)

**TANK INVENTORY**

STATION \_\_\_\_\_ PRODUCT \_\_\_\_\_ TANK SIZE \_\_\_\_\_ GLS  
 MTH/YR \_\_\_\_\_ ACTION LEVEL \_\_\_\_\_ DIAMETER \_\_\_\_\_ INCH

DATE	OPEN PHYS (GALS)	(-) DELV. PHYS (INCH)	CLOSE PHYS (GALS)	(-) CLOSE PHYS (GALS)	(-) PHYS SALES A	METER SALES B	(B-A) DAILY CHNG ±	MTD CULLUM TOTAL	WATER	COMMENTS
1										
2										
3										
4										
5										
6										
7										
SIGNATURE _____					7 DAY SALES	<input type="text"/>	<input type="text"/>	7 DAY CHNG		
8										
9										
10										
11										
12										
13										
14										



# Discharge Reporting

## Maine

- Unless < 10 gallons AND
  - Stays on concrete or paved surface
  - Cleaned up promptly
  - There is no impact or potential impact to groundwater or surface water.
- Log it!

## New Hampshire

- Report unless < 25 gallons AND
  - The discharge is immediately contained
  - Cleaned up promptly
  - There is no impact or potential impact to groundwater or surface water



# Hazardous Waste

## Maine

- Label, date, send to Hazardous Waste facility

<b>HAZARDOUS WASTE</b>
<b>ACCUMULATION</b>
START DATE <u>10/31/05</u>
CONTENTS <u>Fuel/Water/spill debris</u>
<b>HANDLE WITH CARE!</b>
CONTAINS HAZARDOUS OR TOXIC WASTES

Lab Safety Supply Inc.

Reorder No. 620



## New Hampshire

- Label, date, recycle

<b>NON-HAZARDOUS Waste</b>
<b>OPTIONAL INFORMATION</b>
SHIPPER <u>Joe. Bloer Service Station</u>
ADDRESS <u>16 Lollipop Lane</u>
CITY, STATE, ZIP <u>Sugartown, NH 04412</u>
CONTENTS <u>Gasoline for Recycling</u>

**NON-HAZARDOUS WASTE**

BRADY SIGNMARK® DIV.



# Universal Waste

Stations generate Fluorescent Lamps, Cathode Ray Tubes, PCB Ballasts



- Store in closed container
- Label i.e. “Waste Lamps”
- Date of first waste in container
- Number of items in storage
- Secure w/ packing material & tape, send to recycler within 1 year (extra 90 days if container is not yet full)

Photo courtesy of Maine DEP



# Vapor Control

## Maine

- Stage II – York, Cumberland, Sagadahoc counties when throughput exceeds 1,000,000 gal. per year
- Training – at least one person per facility (can represent multiple facilities)
- Keep records of monthly throughput
- Tag out
- Verification testing 5 years or modification/replacement

## New Hampshire

- Stage II – Hillsborough, Merrimack, Rockingham or Stratford counties & 420,000 gal/ OR after 11/15/1990
- Monthly inspection
- Annual pressure decay
- 3 year testing



# Spill Prevention, Control and Countermeasures (SPCC) Plan

- Aboveground oil storage in excess of 1,320 gallons
- Underground oil storage in excess of 42,000 gallons
- Plan must be certified by a professional engineer



# Emergency Planning and Community Right-to-Know Act (EPCRA)

- Chemical Inventory/Tier II & Reporting Fee; March 1: hazardous materials inventory above the TPQ (10,000 lbs~1500 gal.)
- Not required:
  - Gasoline <75,000 gal. (UST)
  - Diesel <100,000 gal. (UST)
- ASTs - example 2,000 gal. kerosene
- Annual Registration Fee; October 1

The screenshot displays the EPA website page for "Tier II Chemical Inventory Reports / Tier2 Submit". The page is titled "U.S. Environmental Protection Agency Chemical Emergency Preparedness and Prevention". The main heading is "Tier II Chemical Inventory Reports / Tier2 Submit". Below this heading, there are several links: "Tier II Basics", "Tier2 Submit Software", "Tier II Forms and Instructions", "Regulation, Guidance, Training and other Tier II Resources", and "Emergency Planning & Community Right to Know FAQs". The "Tier II Basics" section is expanded, showing a list of requirements for facilities covered by EPCRA. The requirements include: the chemical name or common name as indicated on the MSDS; an estimate of the maximum amount of the chemical present at any time during the preceding calendar year and the average daily amount; a brief description of the manner of storage of the chemical; the location of the chemical at the facility; and an indication of whether the owner of the facility elects to withhold location information from disclosure to the public. The page also includes a search bar and a "Print this page" button. The browser's address bar shows the URL: "http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/tier2.htm". The browser's taskbar at the bottom shows several open applications, including "Training", "Compliance Trigg...", "Inbox - Microsoft...", and "EPA Databases ...". The system clock in the bottom right corner shows "10:26 AM".

EPA Databases and Software: Tier II Chemical Inventory Reports / Tier2 Submit - Mozilla Firefox

U.S. Environmental Protection Agency

## Chemical Emergency Preparedness and Prevention

Recent Additions | Contact Us | Print Version Search Area:

EPA Home > CEPPPO > Tools & Resources > Databases and Software > Tier II Chemical Inventory Reports / Tier2 Submit

### Tier II Chemical Inventory Reports / Tier2 Submit

[Print this page](#)

- [Tier II Basics](#)
- [Tier2 Submit Software](#)
- [Tier II Forms and Instructions](#)
- [Regulation, Guidance, Training and other Tier II Resources](#)
- [Emergency Planning & Community Right to Know FAQs](#)

#### Tier II Basics

Facilities covered by The Emergency Planning and Community Right to Know Act (EPCRA) must submit an emergency and hazardous chemical inventory form to the LEPC, the SERC and the local fire department annually. Facilities provide either a Tier I or Tier II form. Most States require the Tier II form. Tier II forms require basic facility identification information, employee contact information for both emergencies and non-emergencies, and information about chemicals stored or used at the facility:

- The chemical name or the common name as indicated on the MSDS;
- An estimate of the maximum amount of the chemical present at any time during the preceding calendar year and the average daily amount;
- A brief description of the manner of storage of the chemical;
- The location of the chemical at the facility; and
- An indication of whether the owner of the facility elects to withhold location information from disclosure to the public.

Some States have specific requirements in addition to the Federal Tier II requirements. To obtain the current Tier II reporting procedures in your State, please use State list below.

Start | Training | Compliance Trigg... | Inbox - Microsoft... | EPA Databases ... | 10:26 AM

# Hazard Communication

- List hazardous chemicals
- Written Hazcom Program
  - Training
  - Labeling
  - MSDS



# Fire Prevention



- Monthly checks for fire extinguishers / annual check by professional inspector
- Fire Suppression system biannual
- Facility representative must observe filling
- Max of 16 nozzles/operator on duty; max 8 in use simultaneously



# Postings

- Stage II instructions
  - Do Not Overfill
  - Phone number DEP / DES
- Fire instructions
  - Stay in view of nozzle
- NFPA

## Warning

*It is unlawful and dangerous to dispense gasoline into unapproved containers.*

*No smoking.*

*Stop Motor.*

*No filling of portable containers in or on a motor vehicle.*

*Place container on ground before filling.*

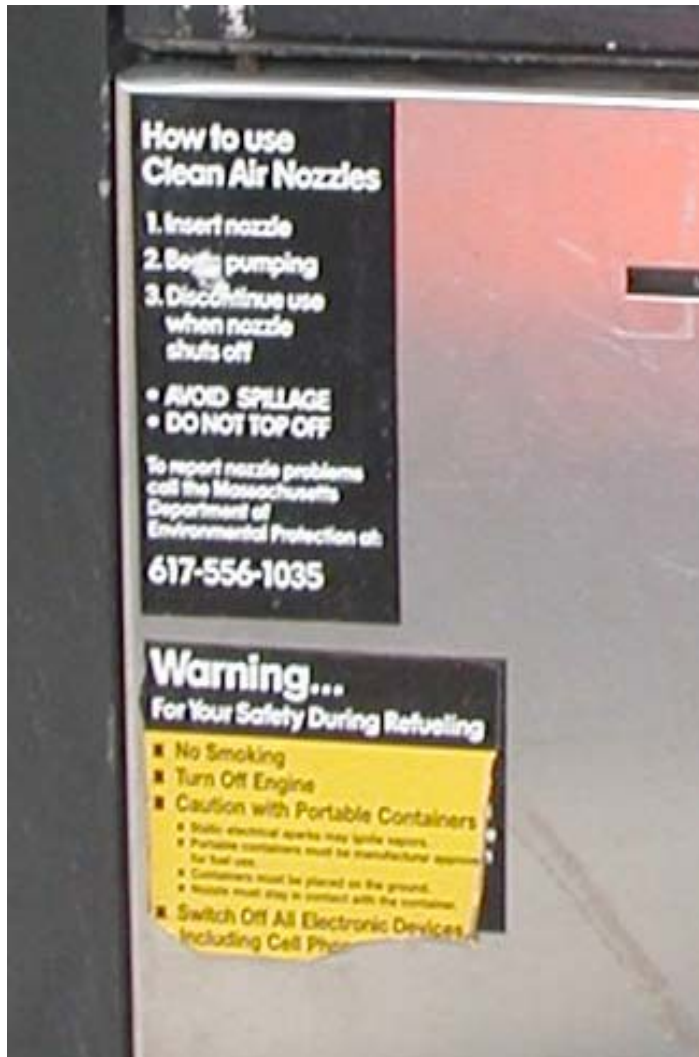
*Discharge your static electricity before fueling by touching a metal surface away from the nozzle.*

*Do not re-enter your vehicle while gasoline is pumping.*

*If a fire starts, **do not** remove nozzle –back away immediately.*

*Do not allow individuals under licensed age to use the pump.*





### For Your Safety During Fueling

**FAILURE TO FOLLOW THESE WARNINGS COULD CAUSE SERIOUS INJURY OR DEATH**

-  **No Smoking**
-  **Turn Off Engine**
-  **Turn Off Cell Phone & Other Electronic Devices**
-  **Fill Portable Containers on the Ground**  
It is unlawful and dangerous to put gasoline into unapproved containers. Never fill gasoline containers in or on vehicle. Static electricity can ignite gasoline vapors and cause a fire. Always put container on ground to fill and keep pump nozzle in contact with the container until finished filling.
-  **Discharge Your Static Electricity Before Fueling**  
Before using pump, touch any metal on the car away from your vehicle's fuel filler with bare hand. This will discharge static electricity on your body. Failure to fully discharge may ignite gasoline vapors.  
Do not re-enter your vehicle while gasoline is pumping. This can re-charge your body with static electricity. If you must re-enter your vehicle, discharge static electricity again before touching the pump nozzle.
- If a Fire Starts, Do Not Remove Nozzle**  
Back away immediately and tell attendant. If no attendant is on site, use the emergency shut-off button to stop pump.
-  **Never Allow Children to Use Pump**  
Only persons of licensed age should use pump. Keep children away from pump area.
- Do Not Leave Pump Unattended When Pumping**
-  **Health Warnings:**  
Harmful or fatal if swallowed. Long-term exposure to vapors has caused cancer in laboratory animals.
  - Avoid prolonged breathing of vapors.
  - Keep face away from nozzle and gas tank.
  - Keep away from eyes and skin.
  - Never siphon by mouth.Failure to use caution may cause serious injury or illness.



# Shameless Plug

St.Germain & Associates, Inc.

[www.stgermain.com](http://www.stgermain.com)

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