

United States Environmental Protection Agency



Underground Storage Tank Compliance Strategy Report

July 6, 2006

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1. Introduction

On August 8, 2005, the President signed the “Underground Storage Tank Compliance Act.” Section 1528 of the Act amends Section 9007 of the Resource Conservation and Recovery Act (RCRA) Subtitle I. Specifically, new RCRA Section 9007(b)(1) requires any federal agency that owns or operates one or more underground storage tanks (USTs) or manages land on which one or more USTs are located to submit a report describing key elements of these tanks to the Administrator of the U.S. Environmental Protection Agency (EPA) and Congress by August 8, 2006. EPA submits this report, supplemented by the information EPA has provided in the Federal Facility and Lands UST Data System on FedCenter (www.fedcenter.gov), to fulfill the requirements described above.

2. Scope

This report provides a summary of federally regulated USTs, as defined by 40 CFR § 280.12, that EPA owns or operates or that are located on lands that EPA manages. The report describes the compliance strategies that EPA has instituted to ensure that all the Agency’s USTs comply with federal, state, and local requirements, and to minimize the risk of environmental impacts associated with their operation.

Detailed information for each of the federally regulated USTs that EPA owns or operates or that are located on lands managed by EPA appears in the Federal Facility and Lands UST Data System on FedCenter and in Appendix A.

3. Approach

EPA used the following approach to collect and verify the information provided in this report.

1. **EPA UST Data Call** – EPA distributed an UST information request to all EPA facilities. Information was collected that addressed all the reporting requirements described by the “*Guidance for Underground Storage Tank Compliance Act 2005 Federal Facility Compliance Report Data System.*”
2. **Data Call Information Verification** – Data call information was verified through interviews with each EPA facility and with federal and/or state regulators responsible for specific USTs. EPA’s 2002 UST inventory was also used to verify information collected.

4. Summary of Federally Regulated USTs Owned or Operated by EPA

Under the requirements of the Underground Storage Tank Compliance Act, EPA is required to report on seventeen USTs. These tanks are located at six facilities owned by EPA. All seventeen USTs have been inspected by the state or federal government in the last three years and have been found to comply with applicable regulations. The tanks at these facilities are described briefly below; detailed information appears in Appendix A.

- *EPA National Vehicle and Fuel Emissions Laboratory, Ann Arbor, Michigan* – There are seven USTs located at this facility which are used to store diesel, gasoline, ethanol, and methanol. The tanks are used to fuel vehicles as part of research and testing operations at the laboratory. All of the USTs were inspected in May 2006 by the state and found to comply with federal and state requirements. In addition, the facility has initiated a fuel system maintenance and training program. The tanks are made of double-walled fiberglass plastic with interstitial monitors, and have overfill protection on inlets, release sensors, and an emergency valve closure function which is tested annually.
- *EPA Andrew W. Breidenbach Environmental Research Center, Cincinnati, Ohio* – There are three USTs located at this facility, each of which contains diesel used both for heating and to power emergency generators. The USTs were inspected by EPA Region 5 on March 9, 2006 and found to be in compliance. During this inspection, documentation from the State of Ohio indicated that the tanks were not federally regulated as they had been registered to contain #2 heating oil only. However, an EPA Region 5 review of the fuel invoice indicated that the tanks contained diesel, and therefore concluded that the tanks are federally regulated. The State of Ohio concurred with this determination and the facility re-registered the USTs in May 2006. The tanks are currently listed as federally regulated tanks in the State of Ohio's database. All of the tanks are double-walled fiberglass reinforced plastic with overfill protection using mechanical float and high level audible alarm, tank interstitial monitoring, piping monitoring, and fuel level alarms.
- *EPA Coastal Ecology Branch Laboratory, Newport Oregon* – There is one UST located at this facility, which contains diesel for use in an emergency generator. This UST was inspected in June 2004 by EPA Region 10 and was found to comply with federal and state requirements. The State of Oregon concurred with these findings. The tank is double-walled fiberglass reinforced plastic with overfill protection devices.
- *EPA Mid-Continent Ecology Research Laboratory, Duluth, Minnesota* – There is one UST located at this facility which contains diesel used both to fuel the boiler for heating and the emergency generator. This UST was inspected in June 2006 by EPA Region 5 and was found to comply with federal and state requirements. In addition, the UST is double-walled fiberglass reinforced plastic equipped with a fill port spill bucket, an overfill alarm, and flow restrictor valve fitted to the tank vent line.
- *EPA Research Triangle Park Laboratory and Office Building, RTP, North Carolina* – There are four USTs at this facility. Two of the USTs are not in operation and are empty. If made operational, they may store gasoline and diesel for vehicles. Therefore EPA has included these tanks in its list of federally regulated USTs. These tanks were inspected by the State of North Carolina and found to be in compliance. Both tanks are double-walled fiberglass reinforced plastic equipped with overfill protection and are inspected on a quarterly basis.

The other two USTs at the Laboratory and Office Building contain diesel used to power emergency generators in two buildings. These were all inspected by the state of North Carolina in April 2006 and found to comply with state and federal requirements. The tanks are double-walled fiberglass reinforced plastic with overfill protection devices. In addition, the facility conducts quarterly inspections of the USTs.

- *EPA Research Triangle Park National Computer Center, RTP, North Carolina* – There is one UST located at this facility which contains diesel used to power an emergency generator. This was inspected by the state of North Carolina in April 2006 and found to comply with state and federal requirements. The tank is double-walled fiberglass reinforced plastic with overfill protection devices and the facility conducts quarterly inspections of the USTs.

5. EPA UST Compliance Management Strategy

EPA maintains a comprehensive Safety, Health, and Environmental Management Program (SHEMP) which has supported EPA facilities in managing regulatory requirements for the past 18 years. This mature program is focused on ensuring compliance with federal, state, and local regulatory requirements as well as instituting industry recognized best practices. Through this program EPA ensures the compliance of all of its regulated USTs.

5.1 Compliance Management Program

A central component of EPA's SHEMP is a robust compliance auditing program that covers all of the regulatory requirements at EPA facilities, including requirements applicable to USTs. Under the compliance auditing program, EPA laboratories are audited on a three-year cycle, and EPA offices are audited on a five-year cycle. These compliance audits include a review of all facility storage tanks, including USTs, by experienced professionals to confirm compliance with regulatory requirements. Reports developed through these audits identify federal, state, and local compliance requirements and recommend corrective actions, where appropriate, that are tracked to completion. In addition, these audits provide best practice recommendations that enable facilities to lead by example in environmental stewardship.

5.2 Environmental Management System

Between 2003 and 2005, EPA implemented Environmental Management Systems (EMS) at all of its major laboratories and its Regional Offices. During EMS implementation, EPA facilities assessed operations with regulatory requirements and other potential environmental risks. This review included an assessment of tank operations that resulted in the establishment or improvement of documented control procedures for these operations. At the completion of EMS implementation, internal audits were conducted by the facilities followed by external reviews conducted for EPA Headquarters. These reviews assessed all elements of the EMS, including control procedures for complying with UST requirements. The EMS is a process of continual improvement; facilities review operations at least annually to identify areas for improvement in environmental performance. At facilities that have regulated USTs, the EMS provides a robust structure to ensure compliance and continually enhance environmental management of these tanks.

5.3 Comprehensive Tank Review

In July 2002, EPA completed a comprehensive review of all of its storage tanks (USTs and above ground storage tanks). This review was initiated to update the agency's inventory of tanks and to ensure that facility emergency response plans existed, were up-to-date, and were easily accessible.

The 2002 EPA national tank review included: 1) a review of national and state tank regulations and best management practices for storage tanks; 2) development of the National Tank Survey, a web-based survey located on the EPA Intranet to collect tank and emergency response information; and 3) development of a National Tank Review report.

Appendix A. Federally Regulated USTs EPA Owns or Operates, or on Land Managed EPA

Key
 * Spill Prevention, Control, and Countermeasure (SPCC)
 ** Operation and Maintenance (O&M)
 *** Emergency Generator (EG)

Facility Name	Point-of-Contact	UST ID		UST LOCATION Address County	Federal Ownership	Federal Operation	UST on Federally Managed Lands	UST Operator Training	Inspection Date, Finding, and Inspection Org.	Status of UST Compliance Strategy	Tank Contents	Tank Capacity (gallons)	Fuel Use
		Tank #	Issuing Org.										
Mid-Continent Ecology Research Laboratory	Rodney Booth booth.rod@epa.gov 218-529-5040	5020 - Y02	State	6201 Congdon Blvd Duluth, MN 55804 Saint Louis	Yes	Yes	No	Yes Contractor received SPCC* and O&M**	Date: 5/30/06 Finding: Compliant By: EPA Internal Inspection	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel	10000	Boiler/EG***
Coastal Ecology Branch Laboratory	Dave Burr burr.dave@epa.gov 541-754-4721	10413	State	2111 SE Marine Science Dr. Newport, OR 97365 Lincoln	Yes	Yes	No	None	Date: 6/29/04 Finding: Compliant By: EPA Region 10	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel	550	EG
National Vehicle Fuel & Emissions Laboratory	Gregory Sturgell sturgell.gregory@epa.gov 734-214-4562	00000132 (TK-21)	State	2565 Plymouth Road Ann Arbor, MI 48105 Washtenaw	Yes	Yes	No	Yes SPCC, O&M	Date: 05/05/04 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Gasoline	8750	Vehicle

Facility Name	Point-of-Contact	UST ID		UST LOCATION Address County	Federal Ownership	Federal Operation	UST on Federally Managed Lands	UST Operator Training	Inspection Date, Finding, and Inspection Org.	Status of UST Compliance Strategy	Tank Contents	Tank Capacity (gallons)	Fuel Use
		Tank #	Issuing Org.										
National Vehicle Fuel & Emissions Laboratory	Gregory Sturgell sturgell.gregory@epa.gov 734-214-4562	00000132 (TK-22)	State	2565 Plymouth Road Ann Arbor, MI 48105 Washtenaw	Yes	Yes	No	Yes SPCC, O&M	Date: 05/05/04 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Gasoline	5400	Vehicle
National Vehicle Fuel & Emissions Laboratory	Gregory Sturgell sturgell.gregory@epa.gov 734-214-4562	00000132 (TK-23)	State	2565 Plymouth Road Ann Arbor, MI 48105 Washtenaw	Yes	Yes	No	Yes SPCC, O&M	Date: 05/05/04 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Gasoline	9,000	Vehicle Testing
National Vehicle Fuel & Emissions Laboratory	Gregory Sturgell sturgell.gregory@epa.gov 734-214-4562	00000132 (TK-24)	State	2565 Plymouth Road Ann Arbor, MI 48105 Washtenaw	Yes	Yes	No	Yes SPCC, O&M	Date: 05/05/04 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel, Gasoline	Three compartments: 3439, 2643, 2643	Vehicle Testing
National Vehicle Fuel & Emissions Laboratory	Gregory Sturgell sturgell.gregory@epa.gov 734-214-4562	00000132 (TK-25)	State	2565 Plymouth Road Ann Arbor, MI 48105 Washtenaw	Yes	Yes	No	Yes SPCC, O&M	Date: 05/05/04 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel, Gasoline	Three compartments: 1561, 1561, 1169	Vehicle Testing

Facility Name	Point-of-Contact	UST ID		UST LOCATION Address County	Federal Ownership	Federal Operation	UST on Federally Managed Lands	UST Operator Training	Inspection Date, Finding, and Inspection Org.	Status of UST Compliance Strategy	Tank Contents	Tank Capacity (gallons)	Fuel Use
		Tank #	Issuing Org.										
National Vehicle Fuel & Emissions Laboratory	Gregory Sturgell sturgell.gregory@epa.gov 734-214-4562	00000132 (TK-26)	State	2565 Plymouth Road Ann Arbor, MI 48105 Washtenaw	Yes	Yes	No	Yes SPCC, O&M	Date: 05/05/04 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Ethanol/ Methanol/ Diesel	Three compartments: 1561, 1169, 1561	Fleet Vehicle
National Vehicle Fuel & Emissions Laboratory	Gregory Sturgell sturgell.gregory@epa.gov 734-214-4562	00000132 (TK-27)	State	2565 Plymouth Road Ann Arbor, MI 48105 Washtenaw	Yes	Yes	No	Yes SPCC, O&M	Date: 05/05/04 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel, Gasoline	Two compartments: 5258, 2635	Vehicle Testing
EPA Andrew W. Breidenbach Environmental Research Center	JR Smith smith.jr@epa.gov 513-569-7268	31009699 (A)	State	26 W. Martin Luther King Dr. Cincinnati, OH 45268 Hamilton	Yes	Yes	No	Yes O&M, SPCC Awareness	Date: 3/9/06 Finding: Compliant By: EPA Region 5	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel	25000	Boiler/ EG
EPA Andrew W. Breidenbach Environmental Research Center	JR Smith smith.jr@epa.gov 513-569-7268	31009699 (B)	State	26 W. Martin Luther King Dr. Cincinnati, OH 45268 Hamilton	Yes	Yes	No	Yes O&M, SPCC Awareness	Date: 3/9/06 Finding: Compliant By: EPA Region 5	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel	25000	Boiler/ EG

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		Tank #	Issuing Org.										
EPA Andrew W. Breidenbach Environmental Research Center	JR Smith smith.jr@epa.gov 513-569-7268	31009699 (C)	State	26 W. Martin Luther King Dr. Cincinnati, OH 45268 Hamilton	Yes	Yes	No	Yes O&M, SPCC Awareness	Date: 3/9/06 Finding: Compliant By: EPA Region 5	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel	25000	Boiler/ EG
RTP - Laboratory & Office Building	Cara Lucas lucas.cara@epa.gov; 919-541-1086	2-036039 (T102)	State	High Bay Building 109 TW Alexander Dr RTP, NC 27711 Durham	Yes	Yes	No	Yes SPCC	Date: 1/25/06 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Gasoline	1000	Vehicle Testing
RTP - Laboratory & Office Building	Cara Lucas lucas.cara@epa.gov; 919-541-1086	2-036039 (T103)	State	High Bay Building 109 TW Alexander Dr RTP, NC 27711 Durham	Yes	Yes	No	Yes SPCC	Date: 1/25/06 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel	6000	Vehicle Testing
RTP - Laboratory & Office Building	Carol Purvis purvis.carol@epa.gov; 919-541-7519	1-036039 (C)	State	Building E 109 TW Alexander Dr RTP, NC 27711 Durham	Yes	Yes	No	Yes SPCC	Date: 4/20/06 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel	10000	EG

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RTP - Laboratory & Office Building	Carol Purvis purvis.carol@epa.gov; 919-541-7519	1-036039 (B)	State	Building B 109 TW Alexander Dr RTP, NC 27711 Durham	Yes	Yes	No	Yes SPCC	Date: 4/20/06 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel	10000	EG
RTP - National Computer Center	Carol Purvis purvis.carol@epa.gov; 919-541-7519	0-036039 (NCC)	State	109 TW Alexander Dr RTP, NC 27711 Durham	Yes	Yes	No	Yes SPCC	Date: 4/20/06 Finding: Compliant By: State	In compliance. Continue facility inspections and ongoing maintenance. Included in triennial compliance audits.	Diesel	8000	EG