



Indiana Petroleum Equipment
Contractors Association

2017

**Annual Underground Storage Tank
Management & Compliance Assistance Seminar**

**Previously Deferred UST Systems - Emergency
Generator Tanks, Airport Hydrant Systems and
Emergency Generator Tanks.**

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Removing Deferrals –Emergency Generator USTs

Leak Detection deferral removed for Emergency Generator Tanks

- Applies to new installations after (IDEM implementation date).
- All other (“old”) EPG tanks must implement leak detection by (the other IDEM implementation date).



Removing Deferrals – Field Constructed USTs and Airport Hydrant Fuel Distribution Systems

- 1988 UST regulation deferred AHS and FCT from meeting release prevention and detection requirements
- 2015 UST regulation removes the deferral, however given the unique nature of these systems EPA created more specific and appropriate requirements for these systems
 - Exceptions to meeting secondary containment requirement for some FCT & AHS piping
 - Provides unique options for meeting release detection requirements
 - One-time notification by October 13, 2018 for these systems
 - Implementation depends on requirement
 - October 13, 2015: release reporting, response, and investigation; financial responsibility; closure, notification (except one-time)
 - October 13, 2018: Spill and overfill prevention, corrosion protection, general operating requirements (including compatibility and repairs), release detection, and operator training
 - Partially excludes aboveground tanks associated with these systems



Emergency Power Generator UST Systems – 2015 Requirement for Release Detection

[In 2015, EPA revised the underground storage tank \(UST\) regulations.](#)

The 1988 UST regulation required UST systems that store fuel solely for use by emergency power generators to meet all of the regulatory requirements except subpart D – the release detection requirements. The revised UST regulation requires owners and operators of emergency power generator UST systems to meet the release detection requirements in subpart D as follows:

Emergency generator UST systems installed on or before October 13, 2015 must begin meeting the release detection requirements not later than October 13, 2018.

Emergency generator UST systems installed after October 13, 2015 must meet release detection requirements when they are installed.

[View more information about release detection requirements.](#)

[Contact Us](#) to ask a question, provide feedback, or report a problem.

An airport hydrant fuel distribution system is an UST system, which fuels aircraft and operates under high pressure with large diameter piping that typically terminates into one or more hydrants, also known as fill stands. The hydrant system begins where fuel enters one or more tanks from an external source such as a pipeline, barge, rail car, or other motor fuel carrier.

Airport hydrant systems often have more than one tank and include:

- aboveground and underground storage tanks storing aircraft fuel;
- directly connected underground piping; and
- other connected tanks holding aircraft fuel such as settling tanks or tanks used to relieve pressure in the system.

Airport hydrant systems do not include:

- tanks not storing aircraft fuel, for example, additive tanks;
- tanks not directly connected to the airport hydrant system, for example, tanks used to power an emergency generator in a pump house; and
- piping connected to those tanks.

Airport hydrant systems may include field-constructed tanks. Field-constructed tanks, which are part of an airport hydrant system are treated as part of the airport hydrant system and not as separate UST systems.

Remember, partially excluded aboveground tanks associated with FCTs and AHSs are still required to comply with subparts A, F, and H, and may be subject to other regulations. EPA partially excludes aboveground tanks associated with FCTs and AHSs that meet the definition of an

What Is A Field-Constructed Tank? What Is An Airport Hydrant System?

A field-constructed tank is a tank constructed in the field. For example, a tank constructed of concrete that is poured in the field, or a steel or fiberglass tank primarily fabricated in the field is considered field constructed.

Field-constructed tanks are not built like conventional UST systems at gas stations. FCTs are typically bulk underground storage tanks that are built on-site and are not pre-fabricated. FCTs range from conventional sizes to very large capacities containing millions of gallons.

How Do You Determine Whether Your Airport Hydrant System Meets EPA's Definition Of A Regulated UST?

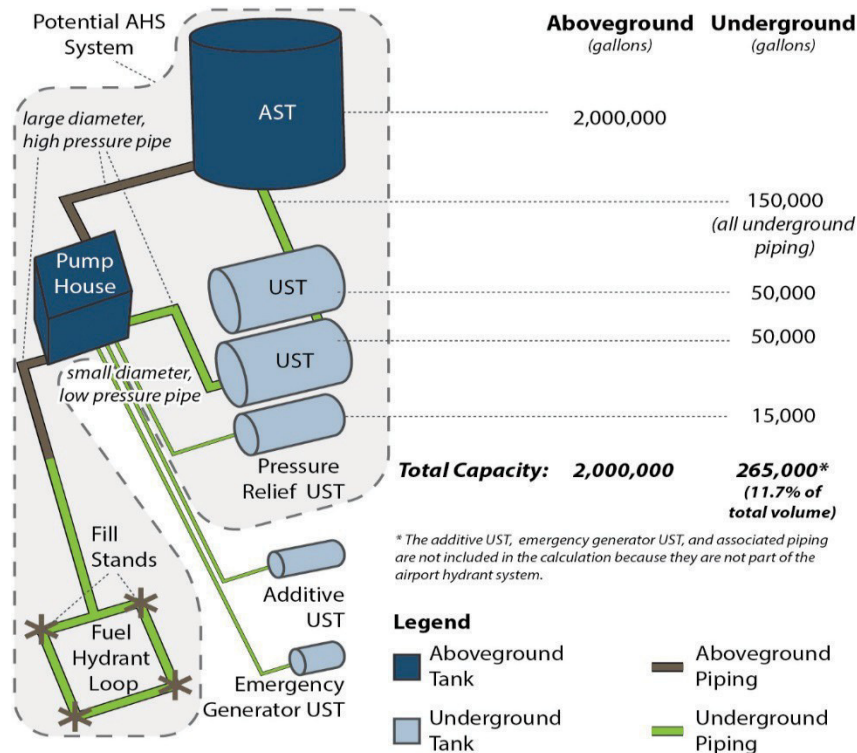
You must first calculate what percentage of volume is underground to determine whether your airport hydrant system is a regulated UST. The calculation must include all aboveground and underground tanks storing aircraft fuel and all underground piping. If 10 percent or more of the total capacity is underground, then the AHS meets the definition of a regulated UST system. Use the examples below to help you perform the calculation.

Example 1 - Airport Hydrant System That Is Regulated

The system below consists of one 2,000,000 gallon aboveground storage tank (AST); two 50,000 gallon USTs; underground piping with 150,000 gallons capacity; and one 15,000 gallon UST for relieving pressure in the line.

The total volume of the system is 2,265,000 gallons. The underground volume is 265,000 gallons or nearly 11.7 percent of the total system volume.

Because the underground capacity is greater than 10 percent of the total system capacity, it is an airport hydrant system according to EPA's definition.



The receipt piping is part of the system where fuel enters one or more tanks from the external source. Include it in the calculation if it does not qualify for the pipeline exclusion in 40 CFR 280.12, or regulated by another agency according to a memorandum of understanding or other agreement with EPA.

For more information on how to determine if an AHS is regulated under 40 CFR 280, see the 2015 UST technical compendium about large airport hydrant systems related to Department of Defense facilities at <https://www.epa.gov/ust/field-constructed-tanks-and-airport-hydrant-systems-2015-requirements>.

Aboveground piping is not included in the calculation because EPA's definition of UST does not include aboveground piping.

Example 2 - Airport Hydrant System That Is Not Regulated

The system below consists of one 2,000,000 gallon AST; one 50,000 gallon UST; underground piping with 100,000 gallons capacity; and one 10,000 gallon UST for relieving pressure in the line.

The total volume of the system is 2,160,000 gallons. The underground volume is 160,000 gallons or nearly 7.5 percent of the total system volume.

Because the underground capacity is less than 10 percent of the total system capacity, it is not a regulated UST system according to EPA's definition. Tanks that are not regulated under 40 CFR part 280 may have to follow other requirements such as those under the Spill Prevention, Control, and Countermeasure (SPCC) regulation.

