



Indiana Department of Environmental Management

Protecting Hoosiers and Our Environment Since 1986



IPECA UST Management & Compliance Assistance Seminar

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New Indiana UST Rule Discussion

IDEM UST Compliance Section

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Quick Stats on UST Sites

As of November 20, 2017

Number of "Active" Sites in Indiana	4155
Sites with tanks installed before 12/22/1988	1174
Sites with tanks from 12/22/1988 to 9/2/2009	3977
Sites with tanks installed after 9/2/2009	476
Sites with mixed generations of tanks	1472



The Indiana UST Rule

- What are we doing with it?
 - Minor edits to some rules
 - Completely deleting some rules
 - Incorporating most of 40 CFR, Part 280 “by reference”
 - Effectively extending implementation timelines of new requirements to match the 2015 version of 40 CFR, Part 280



The Indiana UST Rule

- When does it go into effect?
 - Will have final adoption in early 2018
 - Will become 'effective' near the end of 2018
 - Some new requirements are not implemented until 2021



The Indiana UST Rule

Updates

329 IAC 9 Underground Storage Tanks

- Corrosion Protection
- Spill Buckets
- Overfill Protection
- Containment Sumps
- Tank Release Detection
- Piping Release Detection
- Site Assessments for Groundwater and Vapor Monitoring
- Fuel Compatibility
- Record Keeping changes



The Indiana UST Rule Updates

Corrosion Protection

- Incorporating 40 CFR, Part 280.31 O&M of CP
- Codes of practice
 - NACE International Test Method TM 0101, “Measurement Techniques Related to Criteria for Cathodic Protection of Underground Storage Tank Systems”;
 - NACE International Test Method TM0497, “Measurement Techniques Related to Criteria for Cathodic Protection on Underground or Submerged Metallic Piping Systems”;
 - Steel Tank Institute Recommended Practice R051, “Cathodic Protection Testing Procedures for STI–P3R USTs”;
 - NACE International Standard Practice SP 0285, “External Control of Underground Storage Tank Systems by Cathodic Protection”; or
 - NACE International Standard Practice SP 0169, “Control of External Corrosion on Underground or Submerged Metallic Piping Systems”.



The Indiana UST Rule Updates

Corrosion Protection – Periodic Inspection of Lined USTs

- Incorporating 40 CFR, Part 280.21 Upgrading of Existing USTs
- Codes of practice
 - API RP 1631
 - NLPA 631, Chapter B
 - KWA RP “Video Camera”
- Why is IDEM saying my video inspections aren’t valid?
 - No **PASSING** tightness test? Video camera doesn’t enter the tank
 - Video format doesn’t meet requirements of KWA RP? It’s not valid
 - What’s “Method C”? External Assessment for Structural Integrity of Tank



The Indiana UST Rule

Updates

Spill Buckets / Catchment Basins

- Incorporating 40 CFR, Part 280.30 & 35 Spill and overflow control
- First testing in 2021
- Hydrostatic, vacuum or pressure testing every three years
- Double walled spill buckets (no testing if monitored)
- Other states have had approx. 60% failure rate
- No “drain” requirement
- Keep records for three years
- Standards
 - Manufacturer’s requirements
 - Code of practice (PEI RP 1200)
 - Practice determined by IDEM to be no less protective



The Indiana UST Rule

Updates

Overfill Prevention Equipment

- First testing in 2021
- Physical inspection according to standard
- Flapper, audible alarm, **ball float vent valves**
- No ball floats on new installs & cannot be replaced when bad
- Keep records for three years
- Standards
 - Manufacturer's requirements
 - Code of practice (PEI RP 1200)
 - Practice determined by IDEM to be no less protective



The Indiana UST Rule

Updates

Containment Sumps (when used for interstitial monitoring)

- Incorporating 40 CFR, Part 280.35 Periodic testing...
- First testing in 2021
- Hydrostatic, vacuum or pressure testing every three years
- Double walled sumps (no testing if monitored)
- “Liquid tight” vs alternative test methods
- Standards
 - Manufacturer’s requirements
 - Code of practice (PEI RP 1200)
 - Practice determined by IDEM to be no less protective



The Indiana UST Rule Updates

Tank Release Detection

- Incorporating 40 CFR, Part 280 Subpart D Release Detection
- No effective change in choices – IM required for post 9/2/2009 installations
- **New** annual inspection/testing requirements of components in 2021
- Standards
 - Manufacturer's requirements
 - Code of practice (PEI RP 1200)
 - Practice determined by IDEM to be no less protective



The Indiana UST Rule

Updates

Piping Release Detection

- Incorporating 40 CFR, Part 280 Subpart D Release Detection
- No effective change in choices – IM required for post 9/2/2009 installations (new or replaced)
- **Records** – keep all of them
- Standards
 - Manufacturer's requirements
 - Code of practice (PEI RP 1200)
 - Practice determined by IDEM to be no less protective



The Indiana UST Rule

Updates

Site Assessments for Groundwater and Vapor Monitoring

- Incorporating 40 CFR, Part 280.43 (e) & (f)
- No such systems officially in use in Indiana
- Requires site assessment signed by PE or PG
- Possible NPD for IDEM review & approval of assessment



The Indiana UST Rule

Updates

Fuel Compatibility

- Incorporating 40 CFR, Part 280.32 Compatibility
- 30 day prior notification of >10% ethanol or >20% biodiesel storage
- Must demonstrate current compatibility by component
- What if I don't know detailed information on my tanks?
- Fiberglass tank generations (general guidelines)
 - Pre January 1981 – not compatible with ANY ethanol
 - 1984 to 1988/90 – only compatible with 10% ethanol
 - 1990 to 1995 – only double walled compatible for any level of ethanol
 - After 1995 – compatible with all levels of ethanol/methanol. Some manufacturers only warranty some single walled tanks if special resin is documented.



The Indiana UST Rule

Updates

Record Keeping Changes

- Must submit (short list)
- Must maintain (long list)
- Availability – we are going to ask for it