

UST

QUARTERLY



A Newsletter of the Kentucky Underground Storage Tank Program

January—March 2015
Volume 7, Issue 1

Commonwealth of Kentucky
Steven L. Beshear, Governor

Energy and Environment Cabinet
Leonard K. Peters, Secretary

Department for Environmental Protection
R. Bruce Scott, Commissioner

Division of Waste Management
Anthony R. Hatton, Director

Underground Storage Tank Branch
Edward J. Winner, Manager



21 Years of Dedication— Farewell From Stephen Kent, Supervisor, Compliance Section

accomplishments over the last two decades. EPA partnerships, the RCRA Division and EPA's Office of Underground Storage Tanks), throughout my career. These individuals have given me the opportunity to grow professionally, and I'm grateful to every person who has been a part of my professional journey. I'm a "people person" by nature and have always tried to lead by example and with professionalism. At the end of the day, what I desire the most is to know that I've accomplished the goal of "a job well done." Hopefully I have accomplished that during my time here.

I remember my grandfather telling me when I graduated from high school that I was going to experience amazing technological advances during my lifetime, and he was right. When I started with state government in 1994, I worked on a monochrome monitor connected to a mainframe computer and stored contact information in a card file Rolodex. I reviewed hard copy paper files, and there was no such thing as smart phones, tablets or laptop computers.

I've worked with many wonderful people, both in Kentucky and nationally (Region 4

It's been my pleasure to serve the citizens of the Commonwealth in the Division of Waste Management Underground Storage Tank Program for 21 years. In that time I've encountered a lot of changes. Although change may seem slow for government employees at times, my current perspective reveals that Kentucky's UST program has made incredible progress. I'm proud of our program's many

Inside this issue:

21 Years of Dedication— Farewell From Stephen Kent	1
PSTEAF Reimbursement Check Interception	1
Manager's Message: I Like A New Year	2
The Importance of ATG Alarms	2
UST Response Quarterly	3
Electronic Submittal: Everybody Wins	4

PSTEAF Reimbursement Check Interception

By Jill Stoltz, Supervisor, Claims and Payments Section

Funds reimbursed to an applicant by PSTEAF, a state agency, are subject to interception or offset if an applicant owes an outstanding balance to a state or federal entity. Back taxes, child support, or various other debts or obligations, for example, could cause a reimbursement check interception. Even though the reimbursement check is intended to ensure that money is available to pay the contracted eligible company, the recipient of the reimbursement check is the tank owner/operator. Thus, the applicant's name is listed on the check, not the name of the eligible company. Please note that a Limited Power of Attorney (LPOA) is not sufficient to prevent an interception/offset, as the payment is consid-

ered reimbursement to the applicant and is also made payable to that person or company. This is not a USTB policy. USTB is unable to reverse an interception/offset. If you encounter this unfortunate situation, the interception/offset must be discussed with the Kentucky Department of Revenue or the Internal Revenue Service. For eligible companies, it is suggested that you ask potential clients if they have outstanding debts or obligations owed to the state or federal government. Note again, this may include child support payments. Also, you may want to consider language in your contract to address check interception and how reimbursement will be handled if it occurs.



This newsletter is published by the Underground Storage Tank Branch with state funds and is printed on recycled/recyclable paper.

For more information, comments or story suggestions, please contact the Underground Storage Tank Branch at 502-564-5981.

To report a release or suspected release, call the Environmental Response Branch.
1-800-928-2380

I Like A New Year

By Edward Winner, UST Branch Manager

I like a new year. I don't mean New Year's parties or New Year's resolutions. I mean that I like a fresh start, new opportunities and the enthusiasm associated with such opportunities. The new year is a good time to examine what has passed and lay out plans for what one hopes to see occur in the future.

In this new year, I want to build upon the cooperation and respect shared among the tank owners and operators, your UST contractors and the state's UST Branch, Field Operations Branch and Emergency Response Branch. We purposefully made the effort to build professional, working relationships. I want to strengthen these relationships so that we have accurate registrations, better compliance, fewer releases and faster remediation when releases do occur.

Furthermore, the UST Branch wants to acknowledge the trust and confidence we have in the professional skills and personal ethics of those involved in the operations, maintenance, remediation and regulation of UST systems in the Commonwealth. Such trust and confidence will form the foundation for making the coming year successful.

Finally, I want to encourage each of our readers to develop a vision for, and establish goals that support, superior UST operations in 2015. Timely systems testing, accurate records, careful data collection and diligent customer service should be broad goals for all of us. As for the UST Branch in particular, we have set a goal of 85 percent compliance with operator training through TOOLS. We expect the number of open UST remediation sites to be below 700 by year's end. For tank closures, we've reduced the review time to 30 days starting February 1. We want to pay technically complete claims within one month. In addition, we want to employ the best professional practices we know, the most successful technologies of which we are aware and the finest customer service we can provide to you, the citizens of the Commonwealth.

For more information, contact Edward Winner at 502-564-5981, ext. 4782 or Edward.Winner@ky.gov.

The Importance of ATG Alarms

By Barbara Hankins, Supervisor, Bowling Green Regional Office

The automatic tank gauge (ATG) is electronic equipment that monitors fuel levels in tanks over a period of time to determine if the tank is leaking. ATGs also monitor other aspects of the tank, including but not limited to: water level, high and low fuel alarms, temperature, and volume. The ATG unit incorporates an alarm system to notify the user that an unusual condition has occurred. These alarms often go unnoticed or are ignored by owners/operators and employees. Many believe they are annoyances and alarms are sometimes disabled. However, owners/operators should not make this mistake.

When an ATG is in alarm mode, owners/operators should investigate and identify the issue. If the alarm reads as "failure" then the facility should report it to the Cabinet as a suspected release, in addition to conducting an investigation. When failures or other alarms are ignored, the potential for a release of fuel into the environment is increased. In the event of a release, the longer the alarm goes without investigation, the greater impact to the environment and more costly to the owner in cleanup costs and repairs.

Release detection is a vital part of the UST system and operation. Be diligent and investigate any alarm as soon as it is noticed. Ensure employees are properly trained and understand what to do when the ATG is in alarm mode.



Automatic Tank Gauge showing failure
(Photograph by Richard Denton)

Visit our website today at <http://waste.ky.gov/ust>.

UST Response Quarterly

By Kevin Strohmeier, Response Coordinator/State On-Scene Coordinator

I've examined the 545 hotline calls received in 2014, and 153 of them turned out to be confirmed releases. A confirmed release means that either fuel escaped the tank or lines into the environment, or the environment, typically water, entered the tank or lines. The impact of 153 releases in a year is no small issue! The Environmental Response Team (ERT) mobilized to 95 of these releases.

We would like to thank the UST owners/operators, inspectors and consultants for their diligence in reporting such events to the ERT. Together we're protecting the citizens and environment of the Commonwealth and ensuring Kentuckians receive quality fuel in a safe manner. To help us understand which incidents are most common and to try to prevent these releases, let's examine the ERT records for 2014.

The top reasons for confirmed releases identified from calls to the ERT hotline in 2014 were (See graph):

1. Water in the tank
2. Free product in sumps and environment
3. Customer error – overfills or nozzle drive-offs

Water in the Tank

Of the 153 confirmed releases, it is surprising that the most frequently observed releases were not from fuel in the environment, but from the environment being in the fuel. Confirmed water intrusion greater than a 1-inch depth into a tank accounted for 51 of all confirmed releases for the reporting year. The source of water entry was mostly from damaged or loose riser caps and damaged spill buckets. Infrequently, water entered through damaged risers, vent piping, or Stage II vapor recovery systems. Of course, if water can get in, then fuel can get out. So any one of these flaws in a UST system is an indicator of a possible release into the environment. Either way the potential for damage to the environment as well as damage to customers' vehicles exists.

Water in the tanks is a condition that is preventable with routine inspection and maintenance of riser caps and spill buckets. These inspections should be performed and any problems should be dealt with immediately to prevent larger problems.

Free Product

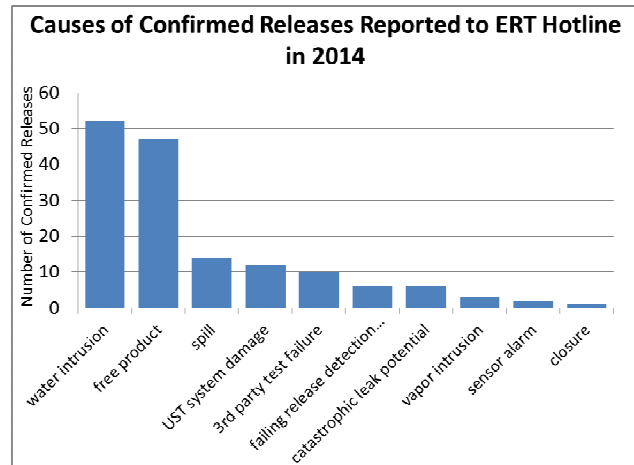
Free product in sumps, and occasionally in the environment, was a close second for the most frequently reported confirmed releases. For the most part, the releases were confined to containment sumps at the dispensers and submerged turbine pumps, which is what we hope for in designing and maintaining compliant UST systems. Free product found in the soil and/or groundwater is an issue that we will address at a later date.

Sensors in post-2013 system installations, or monthly visual

inspections, are used to detect free product in sumps.

Customer Error

Two other frequent causes of confirmed releases, spills and UST system damage, were the result of distracted customers. Customers who overfill their vehicle's tank, or drive off with the dispenser nozzle still in their fill port, account for the third most frequent cause of release. Dispenser strikes were fourth. Finding solutions to prevent these incidents is more difficult because we are dealing with human error. Because of this, encouraging behavior change through educational signage and reminders is one of the most effective prevention tools. There are also some measures that we can take regarding dispensing equipment. Consistent inspection and maintenance of dispenser equipment, such as ensuring that automatic fuel nozzles are installed and functioning properly, will help prevent overfills.



To minimize the chance of releases from dispenser strikes, shear valves (impact valves) are used to prevent significant fuel loss. However, there have been several fires caused by residual fuel moving out of the dispenser piping. Such fires can be prevented with double poppet shear valves that keep the fuel inside the dispenser as well as isolating the fuel in the piping. Installing double poppet shear valves can minimize loss of dispensers and other property from fires, easily justifying the marginally higher expense of the double poppet shear valve.

In summary, keep water from your tanks, keep product out of the environment, take measures to ensure that your customers are aware and alert while fueling their vehicles, and maintain your equipment; these are the key elements in preventing reportable emergencies.

When a release is suspected you are required to contact the Kentucky ERT hotline at (800) 928-2380.



Underground Storage Tank Branch
200 Fair Oaks Lane
Frankfort, KY 40601



UST Program
Information
Enclosed

Electronic Submittals: Everybody Wins

By Tim Mallard, Administrative Section

The UST Branch is very happy to report that the number of documents submitted electronically increased by over 13 percent from 2013 to 2014, while the amount of “snail mail” received decreased by over 24 percent during the same period. These trends represent a significant improvement in efficiency, saving time and money for owners/operators, contractors and the Commonwealth. Here are some tips for you to follow to help make the electronic submittal process work even better:

1) Make sure you are submitting your claim, report or registration to the correct AI (Agency Interest) Number and to the correct portal. This means that claims or reports for different sections cannot be combined in the same submittal. (Claims must go through the Claims and Payments Portal, Site Assessment Reports through the Site Assessment Portal, etc.).

2) Take a moment to “quality check” your document before submitting. Do some pages need to be rotated, rescanned or edited in some other way? Illegible documents can lead to re-

ports or claims being rejected or declared deficient, which needlessly wastes everyone’s time.

3) Submit all pages of a single claim form on one line. This includes claim forms, payment verification, weigh tickets, etc. You can also submit more than one claim for the same AI Number but they must be electronically submitted on separate lines. (For example, an Intermediate SI Report claim is submitted on line 1, a Drum Disposal claim is submitted on line 2, etc.)

4) Classification Guides should be listed on a separate line when included with other reports. These are usually Closure Assessments or Site Checks.

5) Finally, while very large files can be uploaded to our eForm website, our DEP database (TEMPO) cannot yet efficiently process files larger than 20 megabytes (MB). Please consider using your document generation or scanning software to compress documents before submitting them, especially if you see that they exceed 20 MB.

If you need assistance with an electronic submittal, please call (502) 564-5981, ext. 4783 (Registrations or Site Assessment & Remediation), ext. 4771 (Claims and Payments) or ext. 4623 (Operational Compliance). The electronic submittal portals can be found on our website at

<http://waste.ky.gov/UST/Pages/ElectronicSubmittals.aspx>

The Energy and Environment Cabinet does not discriminate on the basis of race, color, national origin, sex, age, sexual orientation, gender identity, religion, disability, ancestry or veteran’s status and provides, on request, reasonable accommodations including auxiliary aids and services necessary to afford an individual with a disability an equal opportunity to participate in all services, programs and activities. To request materials in an alternative format, contact the Underground Storage Tank Branch, 200 Fair Oaks Lane, 2nd Floor, Frankfort, KY 40601 or call 502-564-5981, ext. 4024. Persons with hearing and speech impairments can contact the agency by using the Kentucky Relay Service, a toll-free telecommunication device for the deaf (TDD). For voice to TDD, call 800-648-6057. For TDD to voice, call 800-648-6056.