UST news

S.C. DHEC Summer 2012

Certified, Decertified UST Contractors

Underground storage tank (UST) contractors who are involved with routine investigative activities and interpretation of geologic data associated with releases from UST's must be certified in accordance with the S.C. Underground Petroleum Environmental Response Bank (SUPERB) Site Rehabilitation and Fund Access Regulations R.61-98. The following tables show newly certified contractors as of June 2011 as well as contractors who are no longer certified to conduct activities as defined by R.61-98. For a complete list of certified and decertified contractors, visit **www.scdhec.gov/environment/lwm/html/ust.htm**.

NEW CERTIFIED SITE REHABILITATION CONTRACTORS

PERMIT #	CONTRACTOR	DATE CERTIFIED
UCC-0423	Highlands Environmental Solutions - Raleigh, NC	05/16/2012
UCC-0424	Highlands Environmental Solutions - Wilmington, NC	05/16/2012
UCC-0425	Cameron-Cole, LLC	07/23/2012
UCC-0426	SR&R Environmental, Inc.	07/23/2012
UCC-0427	Winyah Environmental, PC	08/15/2012

DECERTIFIED SITE REHABILITATION CONTRACTORS

PERMIT #	CONTRACTOR	DATE DECERTIFIED
UCC-0380	Cameron Consulting, LLC	02/29/2012
UCC-0229	The Booth Company, Inc.	03/20/2012
UCC-0383	Pandey Environmental, LLC	05/15/2012
UCC-0346	ECOVAC Services	06/11/2012
UCC-0244	Enviro Scan	06/15/2012
UCC-0342	Kemron Environmental Services, Inc.	06/15/2012
UCC-0421	Thomas & Hutton	06/19/2012
UCC-0272	Martin O. Klein, PA	07/09/2012
UCC-0213	Gaia Tech, Inc.	09/11/2012
UCC-0320	Peer Consultants	09/12/2012

Limitations, Advantages of Passive Diffusion Bag Samplers

Minda Hornosky, UST Program, Assessment Section

Passive diffusion bag (PDB) samplers have long been touted as the answer to lowering the costs of groundwater sampling. But are they really the best choice for your site? If your data quality objectives can be met, then these inexpensive and easy-to-use samplers can save time, reduce investigation-derived waste and minimize necessary sampling equipment.

So what might limit or even negate your consideration of using these samplers? Not all compounds are easily transmitted through the polyethylene bag – such as inorganic compounds and the ionic natural attenuation parameters nitrates and sulfates. Concentrations of some volatile organic compounds – such as acetone, methyl-tert-butyl ether, MIBK and styrene – have shown poor correlation (>20 percent) in some laboratory studies and the low-density polyethylene PDB samplers have the potential to contribute phthalates to the sample.

Samples from PDBs are indicative of chemical concentrations over the time interval they are deployed. The deployment interval is dependent on equilibration time. Equilibration is directly effected by temperature, molecular size and shape, molecular polarity, contaminant distribution, permeability of an aquifer and flow dynamics.

Groundwater flow must move horizontally and freely through the well screen interval and provide a sufficient volume of non-stagnant water for sampling. Well screens that transect zones with differing hydraulic head or fluctuating water table conditions may require flow meter analysis.

So, if your site has compatible chemical compounds, no equilibration obstacles and free horizontal flow, how can you evaluate if a PDB sampler is appropriate? Easy. Make a side-by-side comparison with conventional sampling techniques and compare the historical and current data. If the concentrations from the PDB sampler results are higher than the conventional method, it is probable that the PDB sampler represents the ambient conditions. Remember, there is always a greater potential for dilution using conventional sampling methods. If the PDB is significantly lower, however, you may consider further testing to evaluate borehole conditions and chemical distribution.

If both methods produce concentrations within an acceptable range, then long-term monitoring utilizing PDB samplers may be a sampling method that is well suited for your site conditions and can help to optimize your remedial system.

New Air Regulation Affects UST Owners/Operators

Mary Peyton Wall, DHEC's Bureau of Air Quality

On January 10, 2008, the U.S. Environmental Protection Agency published a new air regulation to reduce air pollution from gasoline dispensing facilities. The regulation, known as the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities, is found under 40 CFR 63 Subpart CCCCCC (Subpart 6C).

Three levels of control are required for some owner or operators of these facilities.

- All owners or operators with a monthly throughput of under 10,000 gallons will be required to minimize evaporation by improved work practices such as minimize spills, cover gasoline containers and storage fill pipes with gasketed seals.
- Additionally, larger facilities with a monthly throughput at or above 10,000 gallons will install equipment to reduce the amount of vapors generated (called submerged fill pipes, or drop tubes).
- The largest facilities with a monthly throughput at or above 100,000 gallons also are required to capture and send vapors back into the delivery tank truck (called vapor balancing controls), so that the vapors can be disposed of properly.

This rule applies to existing or new facilities. The affected source includes each gasoline

Continued on back

Site Checks

Denise Place, UST Program, Regulatory and Compliance Section

During a routine site inspection, DHEC personnel will ask for a site check if they suspect that a release has occurred from your tank system. Most of the time, this is a soil sample collected near the site of the release. If petroleum has been released onto the soil, the source of the release must be repaired and ALL contaminated soil should be completely removed and disposed of properly.

A soil sample should then be collected to confirm that the contamination has been completely removed. If results of sampling reveal that enough contamination remains in the soil to affect groundwater, a release will be declared and the report will be sent to the Assessment Section for additional sampling.

Remember that complete removal of the contaminated soil is the first step to avoiding declaration of a release.

SumpTite Elastomeric Coating

Susan Avery, DHEC Region 4 Environmental Quality Control, UST Inspector

As a part of the 2008 S.C. UST Control Regulations, Under-Dispenser Containment (UDC) is required when dispensers are replaced or newly installed within 1,000 feet of an existing community water system or potable drinking water well.

DHEC inspectors are seeing a product being used called SumpTite Elastomeric Coating to upgrade existing containment sumps. If mixed correctly at 77 degrees or greater and applied as a paste, the product should set up completely in one hour. Per the manufacturer, "It is a flexible polysulfide polymer resistant to all motor fuels or motor fuel additives currently in use, including up to 100% ethanol."

Please remember the things below to avoid unnecessary expense due to incorrect installation.

- Read and understand the installation procedures and/or complete on-the-job training provided by manufacturer.
- Take pictures showing the piping before it is covered up. DHEC inspectors will ask during annual inspections for proof that flex connectors and other metal components are isolated from the soil. If isolation boots are used, care must be taken to make certain that leaks are avoided (follow manufacturer protocols).
- Hydrostatic test before returning to service (it is always a good idea to retest new containment 7-10 days following installation).

Contact Trey Morgan at **(803) 896-6678** for more details.

Notes from Permitting

Call **(803) 896-6942** with any questions.

ISSUE: Operating without a Permit to Operate

RECENT SCENARIO: Recently, there has been an increase in the number of facilities that have begun operation of a tank without having received the required permit.

CORRECT PROCEDURE: A Permit to Operate must be obtained prior to operating the tank. **There are no exceptions to this rule.** You, as the tank owner, are ultimately responsible for ensuring DHEC has received all required information. Please keep in mind that if you operate the tank without a permit and you receive a delivery, both you and the supplier will be referred to the enforcement section for penalties.

ISSUE: Ballasting tanks with product

RECENT SCENARIO: Recently, an inspector determined during a piping installation inspection that product had been introduced into a tank several months earlier without DHEC being notified.

CORRECT PROCEDURE: The installation contractor and/or tank owner must notify DHEC in writing **prior** to introducing product into a tank. The tank owner should begin recording daily product levels with a measuring stick as soon as product is delivered. Records of the readings must be maintained until the leak detection method of choice has been installed.

ISSUE: Permit application completion

RECENT SCENARIO: The boxes for interstitial monitoring release detection methods for piping are being checked, but additional information is required.

CORRECT PROCEDURE: Information as to how the monitoring will be performed must be provided – for example, "sensor" or "visual."

RECENT SCENARIO: Applicants continue to record the distance to a water line as "greater than 1000 feet" or is simply left blank.

CORRECT PROCEDURE: It is important to remember that this question applies to not only wells and navigable waters, but also water lines going to your building. The application requires a specific measurement for the distance from the water line to the UST system.

RECENT SCENARIO: There has been confusion about the permitting turnaround time versus a store opening.

CORRECT PROCEDURE: DHEC generally complete permits within three business days. There have been occasions in recent months of tank owners submitting a permit for immediate approval because they want to open the next day. Please keep this turnaround time in mind when you submit an application.

Upgrade Reminder

Jessica Price, UST Program, Regulatory and Compliance Section

According to R.61-92, Part 280: Underground Storage Tank Control Regulations **www.scdhec.gov/environment/lwm/regs/R.61-92_part280.pdf – not later than December 22, 2018, all UST systems located within 100 feet of an existing water supply well, a coastal zone critical area, or state navigable waters must be secondarily contained [Section 280.20(g)] or permanently closed [Subpart G].**

This is a little more than six years away. Start preparing for this upgrade requirement if any part of your system applies to the above criteria. Information on permanent closure can be found at **www.scdhec.gov/administration/library/d-2233.doc**. Information on secondary containment requirements can be found on page 17 at **www.scdhec.gov/environment/lwm/regs/R.61-92_part280.pdf**.

Air Regulation, continued

cargo tank during the delivery of product to a facility and also includes each storage tank. Additionally, depending on where the facility is located, there may be state or local rules already in place requiring these controls. The equipment used for refueling of motor vehicles is not covered by this rule, but is controlled by other regulations set in the 1990's.

The compliance date for Subpart 6C was January 10, 2011. If you have not submitted the required notification and testing reports to DHEC, please send them to: Air Toxics Section Manager, DHEC Bureau of Air Quality, 2600 Bull Street, Columbia SC, 29201. Please contact Mary Peyton Wall at **(803) 898-4064** or **wallmp@dhec.sc.gov** if you have any questions. More information also is available at **www.scdhec.gov/environment/baq/AreaSources/Standards/6C.asp**.

For additional details and assistance, talk to your local environmental contact. These Web sites are for government contacts – **www.epa.gov/ttn/atw/area/regional_contacts.pdf** and **www.smallbiz-enviroweb.org/contacts.aspx** – are good places to start.

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Web: **www.scdhec.gov/ust**
Printed on RECYCLED-CONTENT Paper
DHEC OR-1035 9/12