U.S. General Services Administration (GSA)

GSA Order: Regulated Substances Storage Tank Management
PBS 1095.2A
Office of Facilities Management, Risk Management Division
OFM-RiskManagementDivision@GSA.gov

Purpose:

To revise GSA's policy for managing Fuel Storage Tanks and establish GSA's policy for managing regulated substance storage tanks.

Background:

Federal, state, and local laws establish standards for the management of storage tanks (aboveground [ASTs] or underground [USTs]) used or previously used to store regulated substances, including petroleum. Tanks used to store petroleum are hereafter referred to as fuel storage tanks (FSTs). Tanks used to store other regulated substances are referred to as hazardous substance storage tanks (HSTs). Collectively, these tanks are referred to as regulated substance tanks (RSTs). Owners and operators must install, operate, and maintain all storage tanks that contain regulated substances in a manner that prevents or reduces the potential for release of their contents into the environment. Various laws further mandate requirements for training, emergency planning, release reporting, and closure procedures.

Per 33 U.S.C. 1323 of the Clean Water Act (CWA), and 42 U.S.C. 6991f of the Resource Conservation and Recovery Act (RCRA), federal facilities must comply with Federal, state and local requirements. In addition, consistent with the specific language in each statute, Federal agencies may be subject to civil penalties for non-compliance. Consult with the Office of the General Counsel to determine applicability. States are the primary authority for implementing AST programs. They may also be granted the primary authority to implement the UST program within their boundaries. The governing standards of authorized state programs must be no less stringent than Federal laws. In states that have not been delegated authority, UST systems must comply with the Federal minimum standards.

One of the greatest risks associated with regulated substances storage is the potential for releases that can contaminate surface water, groundwater and soil. Releases can

also pose other risks to the environment, human health and safety, as well as the potential for fire, explosions, property damage, and financial liability.

Applicability:

This order and the companion desk guide apply to Federally owned facilities under the jurisdiction, custody, and control of the GSA. Limited aspects of this order apply to facilities operating under a GSA delegation of operation and maintenance authority and space leased by GSA, as dictated by the provisions of the delegation or lease. This order is not applicable to RSTs associated with property reported excess for disposal through the PBS Office of Real Property Disposition.

This order applies to all GSA employees and contractors as they perform their duties. The following are exceptions:

1. The Office of Inspector General (OIG), given its independence under the Inspector General Reform Act of 2008 (5 U.S.C. §§ 401-424).
2. The Civilian Board of Contract Appeals, due to its independent authorities.

Cancellation:

This Order supersedes GSA Order PBS 1095.2, Fuel Storage Tank Management.

Summary of Changes:

1. Broadened the scope of the existing policy to include regulated substance storage tanks and changed the title of the Order to align with the expanded scope.
2. Established the National Computerized Maintenance Management System (NCMMS) as the mandatory repository of record for the PBS RST inventory.
3. Enhanced the roles and responsibilities discussion.
4. Defined the minimum attributes that must be included in the tank inventory.

Roles and Responsibilities:

1. Implementation of this policy is a shared responsibility among PBS offices who are responsible for incorporating applicable elements into operations, planning activities, management decisions, and policy development. Assignment of roles may vary.
2. The following offices or teams have responsibility for executing the policy described in this Order: Office of Facilities Management (OFM), Office of Architecture and Engineering (OAE); Operations and Maintenance (O&M) Contractors; Office of Acquisitions Management (OAM); Portfolio Management (PT); Office of Leasing (PR); Office of the General Counsel (OGC); and PBS Leadership.

3. A list of the respective offices and responsibilities is found in Appendix A of this Policy.

Signature

/S/_____ 3/11/2025_____

Michael P. Peters
Commissioner
Public Buildings Service

Date

Appendix A: Desk Guide for Regulated Substances Storage Tank Management

Public Buildings Service
Desk Guide
For
Regulated Substances Storage Tank Management
Companion to
PBS Order PBS 1095.2A

Office of Facilities Management

Risk Management Division

March 2025

1. Introduction

This Desk Guide provides supplemental information to PBS Order 1095.2A “Regulated Substances Storage Tank (RST) Management. (“Policy” or “PBS Order 1095.2A”). This Desk Guide contains general information on regulatory requirements but the information provided is not all inclusive. Users must also consult Federal, state, local and jurisdictional governing standards for full requirements.

In accordance with statutory requirements, federal facilities are required to comply with all Federal, state, and local laws and regulations. Where the laws or regulations differ from GSA Policy, the more stringent requirement shall be applied. While this document does not contain a listing of all Federal, state, and local regulatory requirements required for compliance, it incorporates the aspects of the Federal regulations by reference, and states GSA specific requirements that may be more stringent than some regulations.

2. Authority

- 33 U.S.C.§ 1323, Clean Water Act (CWA), Federal facilities pollution control
- 42 U.S.C.§6991 et seq. Regulation of Underground Storage Tanks
- International Fire Code (IFC) (provisions pertaining to underground and above ground fuel storage tanks)
- 40 C.F.R.§112 Oil Pollution Prevention
- 40 C.F.R.§280 Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (USTs)
- 40 C.F.R.§355 Emergency Planning and Notification
- 40 C.F.R.§370 Hazardous Chemical Report; Community Right-To-Know
- 41 C.F.R. §102-80 Federal Management Regulations, Safety and Environmental Management
- National Fire Protection Association (NFPA) codes and standards

3. Applicability

This Policy is applicable to aboveground storage tanks (ASTs) and underground storage tanks (USTs) of all types, used or previously used, to store regulated substances, collectively known as RSTs, as follows:

- RSTs installed on GSA controlled Federally owned property where GSA has O&M responsibilities. The GSA RST Policy and Desk Guide apply in their entirety;
- RSTs installed on GSA controlled Federally owned property where GSA does not have O&M responsibilities. The GSA RST Policy and Desk Guide apply only to the extent that the tanks must meet all applicable Federal, state, and local requirements for installation and operation;
- RSTs at delegated Federally owned property. The GSA RST Policy and Desk Guide apply only to the extent that the tanks must meet all applicable Federal, state, and local requirements for installation and operation. Maintenance records of these tanks do not have to be stored in the NCMMS;

- RSTs at leased facilities. The GSA RST Policy and Desk Guide do not apply to leases unless GSA operates or maintains the RST or it is a requirement per the terms of the lease.

4. Acronyms and Definitions[1]

4.1. Ancillary Equipment. Any devices including, but not limited to piping, fittings, flanges, valves, and pumps used to distribute, meter, or control the flow of regulated substances to and from an RST.

4.2. Aboveground Storage Tank (AST). Any bulk container that has a storage capacity of 55 gallons or more, is used to store regulated substances, and which is located wholly or primarily above the surface of the ground. This includes tanks or other containers that are above ground, partially buried, bunkered, or in a subterranean vault or situated in an underground area (such as a basement [including day tanks/belly tanks], cellar, shaft, or tunnel) and is situated upon or above the surface of the floor and used to store regulated substances.

4.3. Belly Tank. Fuel tanks of any size that are mounted to a building's emergency generators.

4.4. Automatic Tank Gauging (ATG). Equipment that tests for loss of product and inventory control. ATGs must be able to detect a leak at a minimum rate of 0.2 gallons per hour and detect false alarms. Overfill alarms are often used as part of automatic tank gauging systems. Alarms must be connected to an electrical circuit that is active at all times.

4.5. Code of Federal Regulation (CFR). The codification of rules and regulations published in the Federal Register.

4.6. Emergency Generator Fuel Tank (EGT). Fuel tanks that supply fuel to the building emergency generators (Belly Tank or Day Tank). Usually, an AST but can be an UST. Tanks located in a basement or garage are considered ASTs. Other EGT systems, regardless of the physical location (above or below ground) are considered USTs if 10% or more of the total combined volume of the tanks and piping is underground. Federal regulations apply to ASTs with 55 gallons or greater capacity and USTs with a capacity of 110 gallons or greater.

4.7. Fuel Storage Tanks (FST). Any container defined herein as an aboveground or underground storage tank used to store petroleum products. Tanks and cylinders used to store propane, compressed gasses, or other chemicals are excluded from this definition. Also known as a Petroleum Storage Tank.

4.8. Governing Standards. Any applicable tank policy, procedure, statute,

[1] The terms defined herein are for GSA-specific applicability. Refer to listed references for comprehensive lists of EPA definitions.

regulation or related requirements documents issued by a Federal, state, or local regulator, GSA, or codes of practice developed by a nationally recognized association or organization (e.g. NFPA, IFC), GSA design, installation, and operational criteria (e.g. GSA policies and scopes of work, or IFC and NFPA codes and standards).

4.9. Hazardous Materials**.** Federal statutes and regulations define this term differently. For the purpose of this Order, it is defined as any item that is required to have a Safety Data Sheet or is regulated by the Department of Transportation (Table 172.101 Hazardous Materials Table, 40 CFR Part 172).

4.10. Hazardous Substance**.** Classified as listed and unlisted; (1) listed hazardous substances are elements and compounds, and hazardous wastes appearing in the table in 40 CFR Part 302.4; and (2) unlisted hazardous substances are solid waste, as defined in 40 CFR 261.2, which is not excluded from regulation as a hazardous waste under 40 CFR 261.4(b) if it exhibits any of the following characteristics: toxicity, ignitability, reactivity, and corrosivity. For the purpose of this policy, the term does not include hazardous waste, natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

4.11. Hazardous Substances Tank System (HST). A storage tank system used or previously used to store certain hazardous substances as defined in 42 USC § 9601(14). This does not include any substance regulated as a hazardous waste under subtitle C of RCRA, or any mixture of hazardous waste and petroleum, or petroleum storage tanks.

4.12. Hazardous Waste. A solid waste, as defined in 40 CFR 261.2 that also meets the criteria listed in 40 CFR 260.13.

4.13. Heating Oil. Petroleum that is No. 1, No. 2, No. 4-light, No.4-heavy, No. 5-light, No. 5-heavy, and No. 6 technical grades of fuel oil; other residual fuel oils; and other fuels when used as substitutes for one of these fuel oils. Heating oil is typically used in the operation of heating equipment, boilers or furnaces.

4.14. Owner and Operator. The Federal agency that funded (directly or via RWA) the installation and/or operation of a particular RST. The term “operator” refers generically to any Federal agency employee(s) or contractor assigned the responsibility for the management and operations of a federally owned storage tank. Ownership and operatorship are established based on the terms of the applicable purchase and occupancy or use agreement.

4.15. Petroleum. Petroleum, including crude oil or any fraction thereof that is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute). Regulated substance petroleum includes but is not limited to petroleum and petroleum-based substances such as heating oil, motor fuels, jet fuels, distillate fuel oils, residual fuel oils,

lubricants, petroleum solvents, and used oils.

4.16. Regulated Substance. Any substance defined as a hazardous substance in 42 USC § 9601(14) and for the purpose of this policy, petroleum.

4.17. Regulated Substance Tank. Any tank or combination of tanks (aboveground or underground) as defined herein which is used or was previously used to store regulated substances.

4.18. Regulator. The federal, state, or local agency that has authority to regulate the RST programs. These agencies may include the Occupational Safety and Health Administration (OSHA), Environment Protection Agency (EPA), or an authorized state or local agency.

4.19. RST Related Events. Any regulated substance tank-related situation, condition, occurrence, incident, or finding that either creates an Environmental, Health, Safety, or Fire (EHSF) Risk or identifies an existing EHSF Risk. See the GSA Risk Management Notification Policy (PBS 2400.1).

4.20. Spill. Any release of a hazardous substance or hazardous material into the environment. The term is used interchangeably with “release” and includes but is not limited to suspected releases, overfills and spills, and confirmed releases. Release means any spilling, leaking, emitting, discharging, escaping, leaching or disposing from an RST into groundwater, surface water or subsurface soils, or surface soils.

4.21. Spill Prevention, Control, and Countermeasures (SPCC) Plan. A written plan that details the resources, personnel and procedures in place to prevent and control oil spills. An SPCC Plan is required for facilities that store, use, or consume oil and have a total aboveground oil storage capacity of more than 1,320 gallons, or a total UST oil storage capacity of more than 42,000 gallons. When calculating SPCC Plan determinations, all aboveground oil storage containers with a capacity of 55 gallons or greater should be included.

4.22. Suspected Releases. Includes any of the following conditions involving regulated substances at an RST site or in the surrounding area where:

4.22.1. There is a presence of free product or vapor in soils, basements, sewer and utility lines, or nearby surface water.

4.22.2. Unusual operating conditions are observed (such as the erratic behavior of product dispensing from equipment, the sudden loss of product from the tank system, or an unexplained presence of water in the tank), unless: (1) the tank system equipment or component is found not to be releasing regulated substances to the environment; (2) any defective system equipment or component is immediately repaired or replaced; and (3) for

secondarily contained systems, except as provided in 40 CFR 280.43(g)(2)(iv), any liquid found in the interstitial space not used as part of the interstitial monitoring method is immediately removed.

4.22.3. Monitoring results, including investigation of an alarm from a release detection method, indicate a release may have occurred unless: (1) the monitoring device is found to be defective, and is immediately repaired, recalibrated or replaced, and additional monitoring does not confirm the initial result; (2) the leak is contained in the secondary containment; (3) in the case of inventory control, a second month of data does not confirm the initial result or the investigation determines no release has occurred; or (4) the alarm was investigated and determined to be a non-release event.

4.23. Tank System. Collectively any RST (aboveground or underground), the connected piping, ancillary equipment, and containment system, if any.

4.24. Third Party Inspector. Certified by the regulator to conduct on-site RSTs inspections for compliance with 40 CFR 280 requirements or in the case of an authorized state program in accordance with the state program. For ASTs, Third-Party inspections are routinely conducted by a local Fire Marshal or other entity sanctioned by the jurisdiction. Inspections conducted by the O&M Contractor do not satisfy the Third-Party requirement.

4.25. Underground Storage Tank (UST). Any one or combination of tanks (including underground pipes connected thereto) which is used to contain an accumulation of regulated substances, and the volume of which (including the volume of the underground pipes connected thereto) is 10 percent or more beneath the surface of the ground. USTs include but are not limited to tanks that store fuel used to operate emergency generators, or power boilers. USTs with a capacity of 110 gallons or less, tanks located in a basement or garage (ASTs) and equipment or machinery that contains regulated substances for operational purposes such as hydraulic lift tanks and electrical equipment tanks are excluded from the requirements of 40 CFR 280.

5. Policy

GSA owned, installed, or operated RSTs must comply with the latest editions of all applicable Governing Standards (i.e., laws, regulations, manufacturers' manuals, national codes and industry standards), and the procedures set forth herein. Where laws and regulations differ from the GSA policy, the more stringent requirement must be applied.

5.1. GSA or its designees will:

5.1.1. Consider any recognized environmental conditions associated with RSTs during the real estate acquisition due diligence process.

5.1.2. For federally owned space, incorporate in all Occupancy Agreements (OA), delegations of authority, or other interagency agreements language that requires occupants, delegated agencies, or customers to comply with all applicable GSA policies. By reference these policies may include applicable Federal, state, and local regulatory requirements and the responsibility for the cost of compliance in accordance with the Federal Management Regulations (FMR) 41 CFR part 102-80.40.

5.1.3. Ensure that RSTs at federally owned facilities comply with all applicable Governing Standards (i.e. statutes, and their associated Federal, state, and local implementing regulations,applicable IFC and NFPA codes and standards, and GSA design, installation, and operational criteria (e.g. policies and scopes of work) including but not limited to:

5.1.3.1. Make proper reporting and notifications to all appropriate regulators of any planned and unplanned regulated substance tank activities as required by law (e.g. installation, removal, spills).

5.1.3.2. Install, operate, and maintain aboveground storage tanks (ASTs) in accordance with all applicable codes and regulations including 40 CFR Part 112 Oil Pollution Prevention. Equip ASTs with appropriate secondary containment and when required by a governing standard a method of leak detection. Conduct and document periodic inspections (e.g., monthly, annual, third party, etc.).

5.1.3.3. Install, operate, maintain and remove existing underground FSTs in accordance with the general requirements for all UST systems and requirements for petroleum UST systems as published in 40 CFR Part 280 Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (USTs) as amended, all other applicable governing standards, and this Order.

5.1.3.4. Install, operate, maintain and remove all hazardous substance tanks in accordance with the general requirements for all UST systems, and requirements for hazardous substance UST systems as published in 40 CFR Part 280 Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (USTs) as amended, all other applicable governing standards, and this Order.

5.1.3.5. Equip all new and existing underground RSTs with (1) an authorized method of continuous leak detection (e.g. automated tank gauge, interstitial monitoring, etc.) that can detect a release from any portion of the tank and the connected underground piping that routinely contains product and (2) spill prevention systems that will prevent releases of product into the

environment due to corrosion, spills, or overfills as authorized by a governing standard. See 40 CFR Part 280 subpart D for detection options for USTs.

5.1.3.6. Calibrate, operate, inspect, test, repair, maintain, and close tank systems in accordance with applicable current regulatory requirements, manufacturer's instructions, or codes of practice developed by a nationally recognized association or independent laboratory. Where GSA Preventive Maintenance (PM) Guides are the standard, they must be no less protective than the standards listed here.

5.1.3.7. Upgrade or implement closure procedures for any UST system that does not meet the standards of 40 CFR Part 280 Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (USTs), as amended, and this Order.

5.1.3.8. Perform tank repairs, removal, abandonment, or closure by qualified licensed contractors.

5.1.3.9. Maintain a current inventory and management program that encompasses all RSTs located at all GSA-controlled federally owned space. For tank systems operated and maintained by GSA, the inventory must include pertinent information needed to ensure that regulatory compliance elements are properly performed and documented. For tank systems in GSA-controlled federally owned space that is under an O&M delegation, the delegated agency shall maintain tank identifying, operational and maintenance information and provide this information to GSA on an annual basis as requested.

5.1.3.10. For GSA operated facilities, maintain all tank operating and maintenance records (i.e., tank inventory, reports, monitoring records, work orders, and internal and regulatory inspection reports, tank registrations, operator training records, etc.) in the National Computerized Maintenance Management System (NCMMS). Establish and assign job plans and schedules in NCMMS to facilitate the performance and tracking of regulatory environmental compliance requirements and activities (i.e. registration renewal, operator training records, tightness tests, repairs, detailed installation and closure records, etc.). To provide greater protection against future potential environmental liabilities, RST records must be maintained for the life of the facility.

5.1.3.11. Ensure that each GSA-controlled federally owned space containing an UST or AST (or both) has GSA and O&M personnel designated and trained for each class of UST Operator, and who are trained on both UST and AST operations and response procedures as required by Federal, state, and local regulation, the national Operations and Maintenance

(O&M) specification, and GSA policies. Training required for GSA and vendor personnel is the responsibility of the respective employing entity.

5.1.3.12. Develop, document, and maintain the appropriate level of site-specific spill prevention and control procedures in accordance with Federal, state, and local regulation and as required in the national O&M specification or this Order, whichever is more stringent.

5.1.3.13. Make reasonable accommodations to comply with Federal, state, or local regulators requests for tank related information or to access GSA-controlled space for the purpose of conducting compliance inspections.

5.1.3.14. Complete Emergency Planning and Community Right-to-Know Act (EPCRA) notifications and reporting requirements in accordance with applicable sections of Title 40 CFR, Parts 68, 350, 355, 370 and 372.

5.1.3.15. Upon discovery, clean up spills and report releases to appropriate authorities as required by Federal, state and local regulators.

5.1.3.16. Make internal and external notification of releases and other RST-related events in accordance with the GSA Risk Management Notification Policy (PBS 2400.1) and as required by the Office of Mission Assurance (OMA)/PBS managed Facility Event Notification System (FENS) [OMA Order 2400.2 as amended].

6. Roles and Responsibilities

This desk guide and associated Policy (PBS 1095.2A) highlight some of the key functions necessary to ensure compliance with Federal RST requirements. As state and local regulations can be more stringent than the Federal requirements, it is the responsibility of staff to determine all requirements applicable to their facilities. While many of the operational functions are performed by O&M Contractors, it is ultimately GSA's responsibility to ensure that operations are compliant. The listed office names and roles for the respective responsibilities are meant to serve as guidance and may vary by office.

6.1. Office of Facilities Management (OFM) Facilities Risk Management Division

6.1.1. Develop, issue, and provide updates to the regulated storage tank (RST) management policy and procedures.

6.1.2. Provide technical assistance to Building Managers.

6.1.3. Evaluate performance relative to RST management requirements as part of the established tank program quality control process.

6.1.4. Support Environmental staff with matters related to RST Management.

6.1.5. Develop and provide RST training materials for use by PBS employees.
6.1.6. Monitor the National RST Program for inventory completeness and environmental compliance tracking using data collected in the NCMMS.
6.1.7. Monitor tank program performance via analyses of tank information maintained in NCMMS and gathered as part of the Risk Management (RM) Program Assessments and the Facilities Management Assessment Survey Program.

6.2. OFM Office of Technology & Innovation

6.2.1. Deploy, maintain, and support GSA's Smart Building technology framework including the National Computerized Maintenance Management System (NCMMS).
6.2.2. Maintain the NCMMS to accommodate storage of RST records and job plans needed to meet monitor regulatory and GSA RST requirements.

6.3. OFM Office of Facilities Operations

6.3.1. In conjunction with the Office of Mission Assurance (OMA), develop internal reporting procedures for emergency notifications.
6.3.2. Coordinate internal release reporting with Building Operators, Property Management Community, and/or Client Agencies/Operators.
6.3.3. Record and disseminate reported incident data.
6.3.4. Ensure that O&M master specification incorporates RST requirements. Owns and maintains GSA's Service Contract Master Specifications, which include NCMMS usage requirements for its service Contractors.
6.3.4.1. Owns and maintains the GSA Preventive Maintenance Guide (PM Guide) process used in NCMMS to schedule and issue maintenance work orders.
6.3.4.2. Monitors NCMMS effectiveness in achieving PBS's goals using the Management Analysis Review System (MARS) which includes review of NCMMS data to evaluate overall program compliance and effectiveness of internal management controls.
6.3.4.3. Ensure that all delegation agreements include language that requires compliance with all applicable policies and regulations.

6.4. Office of Architecture and Engineering

6.4.1. Ensure that all issued policies and guidance documents involving RSTs include language that requires compliance with applicable RST policies and regulations.
6.4.2. For projects that involve major RST activities such as installation, and replacement; provide relevant subject matter expertise to support

business lines in providing quality assurance over architecture and engineering related design work. Coordinate with the Office of Project Delivery to ensure standardized criteria for Scopes of Work (SOWs) and Independent Government Estimates (IGEs) are developed and implemented to support project team activities in all phases of project delivery.

6.5. Environmental, Health, Safety & Fire Community

6.5.1. Provide technical support to the Building Operations and Property Management Communities in determining compliance status, notification and reporting requirements, and developing plans and scopes of work.

6.5.2. Determine and communicate applicable Federal, state and local requirements to staff.

6.5.3. Maintain comprehensive knowledge of environmentally regulated RST related activities wide.

6.5.4. Routinely monitor tank program performance for compliance with this policy and regulatory requirements. Conduct inspections and audits of regulated storage tank records no less than every two years to assess compliance with GSA policy and environmental regulations. Monitor the RST inventory for accuracy and environmental compliance tracking at least annually.

6.5.5. Develop and implement locality-specific training programs for staff as necessary to enhance their understanding of regulatory requirements and best practices related to storage tank management.

6.5.6. Assign and monitor RST related Conditions in the Facilities Management Assessment (FMA) Module for corrective actions to be taken.

6.5.7. Continuously assess and update procedures related to regulated storage tanks to reflect changes in regulations and industry best practices.

6.6. Building Operations / Property Management Community

6.6.1. Comply with the GSA RST Policy and perform other RST tasks listed in this section based on locally designated responsibility assignment.

6.6.2. Monitor the RST inventory in the NCMMS for completeness and accuracy at least annually.

6.6.3. Coordinate with the EHSF staff and O&M to ensure proper notifications are made to applicable regulatory agencies (e.g., installation, closure, release, removal/closure, and Emergency Planning and Community Right-to-Know Act [EPCRA] reporting or state equivalent) and maintain the documentation in accordance with this desk guide.

6.6.4. Ensure that GSA and O&M personnel are designated and trained for both operator and site-specific spill response.

6.6.5. Coordinate the development and maintenance of SPCC Plans or other spill plans as appropriate to the locations' RST risks.

6.6.6. Ensure that contract scopes of work and work performed by contractors complies with GSA's RST Policy and regulatory requirements.

6.6.7. Coordinate internal GSA release reporting in accordance with the Risk Notification Policy and the Facility Event Notification System (FENS).

6.6.8. Request funds for any corrective actions needed to achieve and maintain compliance with RST policies and regulations.

6.6.9. Monitor operators' performance for compliance with this policy and regulatory requirements.

6.6.10. Assign and monitor RST related risk conditions in the Facilities Management Assessment (FMA) Module in the Inventory Reporting Information System (IRIS) to ensure correct actions are taken.

6.6.11. Maintain records and documentation in accordance with this Policy and desk guide.

6.7. O&M Contractors

6.7.1. Comply with the terms and conditions of their contract related to tank related regulatory compliance and operational requirements, and applicable requirements of GSA policies and desk guides.

6.7.2. Develop and maintain a current RST inventory in the NCMMS for all tanks located in GSA controlled space, except for buildings where the O&M has been delegated to another Federal agency.

6.7.3. Make proper notifications to applicable regulatory agencies (e.g., installation, closure, removal, release, and Emergency Planning and Community Right-to-Know Act [EPCRA] reporting or state equivalent) and maintain documentation in accordance with the terms of the contract, this policy and desk guide.

6.7.4. Ensure that O&M personnel are designated and trained for both operator and site-specific spill response.

6.7.5. Coordinate the development and maintenance of the SPCC Plan or other spill plans as appropriate to the facility's RST risks.

6.7.6. Ensure work performed complies with GSA's RST Policy and regulatory requirements.

6.7.7. Coordinate internal GSA release reporting in accordance with protocol, the Risk Notification Policy and the Facility Event Notification System (FENS).

6.7.8. Inform the COR and Building Manager of projects or any corrective actions needed to achieve and maintain compliance with RST policies and regulations.

6.7.9. Take appropriate corrective actions when assigned to mitigate RST related Risk Conditions in the FMA Module of IRIS.

6.7.10. Maintain records and documentation in accordance with this Policy and desk guide.

6.8. Acquisitions Teams

6.8.1. Operations Division/Service Center Division, in conjunction with the Building Management Team and Environmental Staff: Ensure that all tank related performance, training and other deliverables are included in the O&M contract statement of work (SOW).

6.8.2. Office of Project Delivery

6.8.2.1. The Center for Cost, Schedule, and Tools develops policies and best practices for all independent government estimates and scheduling activities.

6.8.2.2. The Center for Construction Excellence provides guidance and/or policy on SOW development, project management best practices, and Risk Management for projects to ensure compliance and effective execution.

6.8.3. Contracting Officer (CO): Ensure that contract identified deliverables are made available to the COR. Record and disseminate reported incidents of contract non-compliance.

6.8.4. Contracting Officer's Representative (COR)/Contracting Officer's Technical Representative (COTR):

6.8.4.1. Reviewing O&M Contractor updates to Asset and Location Records for approval at the start of O&M service contracts.

6.8.4.2. Perform all tasks outlined in the COR appointment letter.

6.8.4.3. Consult with the Environmental staff on tank regulatory technical requirements.

6.8.4.4. Ensure that changes to Asset Records are properly accounted for in NCMMS and the O&M Service Contract is modified when appropriate.

6.8.4.5. Monitor/report on O&M contractor performance for compliance with contract SOW, RST Policy, and regulations.

6.8.4.6. Review and perform COR functions as outlined in the NCMMS Desk Guide including but not limited to ensuring that O&M Contractor:

- maintain current, accurate tank Asset data in NCMMS
- inputs and maintains Asset Attribute data in the NCMMS Asset Application Specifications tabs.

6.8.5. Contracting Officer (CO): Ensure that contract identified deliverables are made available to the COR. Record and disseminate reported incidents of contract non-compliance.

6.9. Portfolio Management and Customer Engagement

6.9.1. Ensure that terms and conditions of all OAs include language that requires compliance with GSA policies.

6.9.2. Facilitate communications as necessary between GSA and client agencies relative to RST concerns.

6.9.3. Coordinate with Building Managers and individuals who manage the RST program to identify and prioritize large, tank-related projects that should be included in long term asset planning discussions.

6.9.4. Engage with the EHSF community as needed to review proposed RST related projects for priority consideration and EHSF regulatory compliance.

6.10. Office of Leasing

6.10.1. Ensure that the terms and conditions of all new agreements (Leases and OAs) include language that requires compliance with all applicable GSA policies.

6.11. Office of the General Counsel

6.11.1. Provide legal advice relative to RSTs and GSA's statutory and regulatory responsibilities.

6.12. Leadership

6.12.1. Promote RST program compliance through planning, budgeting, management decisions, and policy development.

6.12.2. Require that reasonable accommodations are made to comply with Federal, state, or local regulators requests for tank related information or to access GSA-controlled space for the purpose of conducting compliance inspections.

7. Contracting for RST Services

Contractors often provide tank system services or support to GSA including installation, O&M, removal, closure, and preparation of plans. Therefore, contract scopes of work must reflect the requirements included in GSA's RST Policy. Contractors must be informed of their responsibilities relative to compliance with GSA's RST Policy, as well as expectations to comply with all Federal, state, and local regulations. Per the terms of the contract, the O&M contractor is responsible for performing the maintenance and administrative tasks outlined in this desk guide. While contracts for RST services require contract staff to have proper qualifications and certifications to perform work in compliance with all regulatory requirements, GSA's liability does not necessarily transfer to the contractor. Even if a contractor performs the work, GSA can be held liable for work performed on GSA property. Therefore, GSA Building Managers and Contracting Officers Representatives are required to provide proper oversight of contractors to ensure compliance with the GSA RST Policy and applicable regulations.

8. RSTs at GSA Leased and Delegated Properties

Lessors and agencies with delegated O&M authority are required to comply with all applicable RST Federal, state, and local jurisdictions' regulatory requirements. GSA shall ensure that language mandating compliance with regulatory requirements is included in leases and delegation agreements. If language in the agreement is not specific to RSTs, it must clearly state that operations will be conducted in compliance with all applicable regulations and GSA policies.

9. Notifications for Planned RST Activities

Notifications must be made to the appropriate authorities when making changes such as tank installation, closure, and removal. Field staff shall consult state and local agencies for specific requirements as they may vary by jurisdiction. Notification shall be made only when required by a regulatory implementing agency. The following minimum notifications must be made to the respective regulatory authorities:

9.1. ASTs

- Notifications shall be made as specified by the state and local regulator.
    - State requirements, when applicable, vary and are typically associated with permitting and registration. States often require that tanks be registered within 30 days of installation.
    - Although not a notification per se, some states require owner/operators to submit Spill Plans.
- There are no specific Federal EPA requirements other than the Emergency Planning and Community Right-to-Know Act (EPCRA) and SPCC Plan.

9.2. USTs

- Within 30 days of bringing a tank into use (40 CFR 280.22); and
- At least 30 days before beginning either permanent closure or when there is a change in the product stored in the UST (40 CFR 280.71).

10. Installation and Operations & Maintenance Requirements[2]

The compliance date to meet regulatory installation and operations requirements is dependent on when the RST was installed or brought into operation. Decisions to upgrade or remove an existing tank shall be determined individually by applying the following criteria: (1) potential for harm (considerations include if tank has properly functioning monitoring/spill prevention equipment, age, condition, performance records, etc.), (2) ownership/operator responsibility (3) future plans for the building (considerations include excessing, major renovations where tank removal/upgrade is or can be included, etc.). Funding tank system replacement or upgrades shall be prioritized based on the criteria described above.

[2] This Desk Guide and PBS Order 1095.2A provide general information on regulatory requirements. Except where more stringent, these documents do not replace, or supersede any Federal, state or local regulations or requirements. Users must consult Federal, state, local and jurisdictional governing standards for full requirements. State regulations may be more stringent than Federal requirements.

- When a new non-petroleum HST is needed and where regulations allow, and based on the intended use, preference should be given to replacements in the following order (1) double walled AST; concrete vaulted AST or subterranean AST; and (2) UST (double-walled fiberglass reinforced plastic).

- RST installation shall be in accordance with applicable laws, codes, and manufacturer's instructions and performed by qualified contractors, based on state requirements. All components of the RST system must be constructed of or lined with materials compatible with the substance to be stored in the tank. Once installed, tank systems shall be marked with the appropriate hazard warnings in accordance with OSHA and NFPA standards, maintained in accordance with applicable regulations and operated in a manner to reduce or prevent potential releases to the environment.

10.1. ASTs

10.1.1. Installation

AST design, installation and operation shall be conducted in accordance with 40 CFR 112.12 (a)-(c) and all applicable industry standards and local codes, including applicable rules set forth in the following publications: Occupations Safety and Health regulations (29 CFR 1926.152(i)), National Fire Protection Association (NFPA) 30, 30A, 31 and 704, International Fire Code (IFC) and other applicable standards; see the Related Publications listed in this Desk Guide for additional applicable standards and codes. NFPA rules cover installation and operation standards for storage tanks, oil handling systems, and oil burning equipment. Installed ASTs must be certified to meet Underwriters Laboratory (UL) Standard 2085 and include a manufacturer's warranty. State and local regulatory agencies may have specific installation requirements; consult with these agencies to determine additional requirements, if any.

GSA requires that ASTs have secondary containment.

Remember! Tanks located in a basement or garage are ASTs, Not USTs.

- Open containment systems must be capable of containing the contents of the largest tank - plus an additional volume calculated based on potential rainfall events when applicable.
- Containment areas must not be used for storage of equipment (i.e., spill response equipment, ladders, buckets, etc.) that will reduce the capacity of the secondary containment area.
- Operators must monitor and release accumulated rainwater, maintain and test valves, and keep discharge logs.
- Based on state or local requirements use of double-walled tanks may eliminate the need to maintain secondary containment areas.

10.1.2. Operations and Maintenance

ASTs are required by GSA to include spill and overfill protection, release detection, secondary containment protection and corrosion protection as needed. Written procedures must also be in place for testing and inspecting ASTs and conducting tank repairs. Consult the state agency for specific AST O&M requirements.

10.1.2.1. Designated point of contact. Someone at each facility must be designated in writing who is responsible for discharge prevention.

10.1.2.2. Spill and Overfill Protection. Follow tank management standards (e.g., American Petroleum Institute) and include a secondary containment area for visual detection of spills and leaks. Where dictated by oil storage capacity, the facility must have a SPCC Plan prepared.

10.1.2.3. Secondary Containment. At a minimum, one of the following prevention systems, or its equivalent, must be used as a means of secondary containment:

- Open secondary containment walls;
- Closed secondary containment (for double-walled tanks);
- Dikes, berms, or retaining walls sufficiently impervious to contain oil;
- Curbing or drip pans;
- Sumps and collection systems (only with Professional Engineer approval);
- Culverting, gutters, or other drainage system (only with Professional Engineer approval);
- Spill diversion ponds or retention ponds (only allowed with Professional Engineer approval).

10.1.2.4. Testing and Inspections. Test and inspect aboveground RSTs on a routine basis and when repairs are made. The frequency is commonly defined by the state and local governing authority or the SPCC Plan. In the absence of an established frequency, Tanks shall be tested or inspected by a third-party at least every three (3) years.

Per 40 CFR 112.8(c)(6), examples of integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing.

10.1.2.4.1. Industry standards must be used to determine the qualifications of persons performing the test and type of test or inspection. Third-party inspectors must be trained in the state-specific inspection protocols and perform inspections that meet these standards. Where a state

third-party program exists, training must be comparable to the training required for state inspectors.

Possible sources of training and certification may include Standards Developing Organizations such as the American Petroleum Institute, Petroleum Equipment Institute, Steel Tank Institute, state regulatory agencies, and state sanctioned third-party private sector inspection companies.

10.1.2.4.2. In-house visual inspections are required to be conducted and documented by O&M contractors for all RSTs monthly (i.e. every 30-days). During these inspections, look for signs of leaks, stress fractures, stressed vegetation, visible water in the secondary containment area and proper tank labeling/marking (EPA, NFPA, OSHA Hazard Warnings, etc.). Inspections must be documented in accordance with the recordkeeping requirements described below and the PM and Job Plans within NCMMS.

Note! GSA Policy requires visual inspections of RSTs to be conducted monthly. Inspections must be documented and maintained according to the recordkeeping requirements of this Policy.

10.1.2.5. Tank Repairs. All tank repairs must be performed by qualified contractors who are certified to make repairs to the specific equipment they are repairing, in accordance with the tank warranty. Consult the state agency for specific tank repair reporting requirements. Note: Reporting requirements differ for facilities that are covered by a SPCC Plan.

10.2. USTs

10.2.1 Installation

New UST systems must be installed in accordance with Federal, state, and local requirements, industry codes and standards, and manufacturer's instructions. All tanks must be designed, constructed and installed by licensed and certified installers in accordance with all applicable parts of 40 CFR 280.20. USTs must be UL Certified and carry a manufacturer's warranty. UST installation and operation must also comply with applicable NFPA and IFC codes and industry standards. This includes, but is not limited to, spill and overfill control, corrosion protection, release detection, and secondary containment.

The preferred type of UST is a double-walled fiberglass reinforced plastic (FRP) tank. The tank and all ancillary equipment must be compatible with the substance to be stored in the tank (40 CFR 280 32). In addition to meeting the requirements for all USTs (40 CFR 280.40), FSTs must also meet the requirements of 40 CFR 280.41, and in accordance with GSA's RST Policy (PBS Order 1095.2A), be

equipped with interstitial monitoring and an automatic tank gauge (ATG) system. Hazardous Substance Tanks must meet the additional requirements listed in 40 CFR 280.42.

USTs that were previously installed (existing tanks) must comply with one of the upgrade options found in 40 CFR 280.21. Options for continued use of existing USTs:

- Replace with a new UST that meets the performance standards under § 280.20;
- Upgrade in accordance with the requirements in paragraphs (b) through (d) of 280.21; or
- Permanently Close the tank in accordance with requirements under subpart G of Part 280, including applicable release response and corrective action requirements under Subpart F of 40 CFR 280.

NOTE: Tanks with inoperable/malfunctioning ATGs and/or interstitial monitoring systems that do not provide for continuous 30-day report do not satisfy the continuous 30-day monitoring requirement.

10.2.1. Operations and Maintenance

Tank systems shall be operated and maintained to reduce and prevent releases. Tank systems are a complex collection of mechanical and electronic equipment that can fail under certain conditions. These failures can be prevented or quickly detected by following required O&M procedures, including those outlined in the manufacturer's instructions, GSA's Preventive Maintenance (PM) Manual and Job Plans, PBS Order PBS 1095.2A and this Desk Guide. To minimize potential environmental liability, it is imperative that tank systems are properly operated, continuously monitored and maintained to ensure that leaks are avoided or quickly detected. The following provides an overview, the cited regulations should be consulted for more complete information.

10.2.1.1. Spill and Overfill Protection (40 CFR 280.30). Measures to prevent spills and overfill include monitoring filling operations and ensuring that the amount of open capacity in the tank is greater than the amount of product being added. In addition, overfill prevention equipment is required, including an overfill alarm, an overfill prevention device (such as a fill limiter), and a spill bucket. [(40 CFR 280.20(c)(1) - (4)]

10.2.1.2. Corrosion Protection (40 CFR 280.31). USTs constructed of FRP (tanks and piping) do not require corrosion protection measures as FRP does not corrode. Steel UST systems (tanks and piping) must be designed to prevent leaks and releases during the tank's lifetime. To ensure corrosion protection is effective:

- Use a recognized tank industry standard for inspections;

- Test cathodic systems within six (6) months of installation and every three (3) years thereafter by a qualified inspector;
- Inspect impressed current cathodic protection system every 60 days; and
- Maintain records to demonstrate compliance in NCMMS.

10.2.1.3. Release Detection (40 CFR 280 Subpart D). All tank systems must meet the leak detection general requirements applicable to all USTs in 40 CFR 280 Subpart D. In addition to the general requirements, FSTs must meet the leak detection requirements for petroleum tanks (40 CFR 280.41) and hazardous substances tanks must meet the additional requirements found in 40 CFR part 280.42. Any UST system that cannot comply with the release detection requirements of this regulation must complete the closure procedures in subpart G of this subpart.

10.2.1.3.1. All Regulated Substance Tanks must meet the requirements of the GSA Policy and based on the product to be stored, the applicable section of 40 CFR 280.41. Each tank system must include an ATG to monitor for releases. Other methods can be used in conjunction with an ATG if the method can detect a release from any portion of the tank and the connected underground piping. The methodology used must detect releases from any portion of the UST system that contains product, and must be installed, calibrated, operated, and maintained as specified in the manufacturer's instructions.

10.2.1.3.2. Piping release detection must be monitored in accordance with automatic line leak detectors (for pressurized piping systems), line tightness testing, and applicable tank methods. Suction piping systems that meet specific design criteria (i.e., below grade, product drains back into the tank once suction is released, etc.) do not require release detection equipment (40 CFR 280.41(b)(ii)). Additional FST piping release detection options are outlined in 40 CFR 280.41, and in 40 CFR 280.42 for HST piping.

NOTE: Unless specifically designed and equipped to do so, ATGs do not monitor leaks on piping systems.

Table 1: UST System Release Detection Methods

Component	Type of Release Detection Monitoring	Release Detection Description	New Tanks	Existing Tanks	
USTs (40 CFR 280.41-43)	Inventory Control, Manual Tank Gauging, and 3 YEARS Testing	GSA Policy requires USTs to be equipped with ATGs. Therefore, these methods should only be used in conjunction with or as backup monitoring/testing or when the ATG is not performing to standard.	X	X	
	Automatic Tank Gauging	New and existing USTs are required to be equipped with ATGs. Equipment for automatic tank gauging must meet the requirements in (40 CFR 280.43(d)): (1) Must detect a 0.2 gallon per hour leak rate from any portion of the tank that routinely contains product; **AND** (2) Inventory control must detect a release of at least 1.0 percent of flow through plus 130 gallons monthly. **AND** (3) Tests must be run in an approved operating mode.	X	X	
	Vapor Monitoring	Only use when testing or monitoring for suspected releases (40 CFR 280.43(e)).	X	X	
	Groundwater Monitoring	Only use when testing or monitoring for suspected releases (40 CFR 280.43(f)).	X	X	
	Interstitial Monitoring	This method, used in conjunction with an ATG, must meet one of the following method requirements (40 CFR 280.43(g)): (1) Double Wall UST Systems: Detect a release through the inner wall in any portion of the tank that routinely contains product; (2) Secondary Barrier Within the Excavation Zone: Detect a release between the UST system and the secondary barrier; **OR** (3) Internally Fitted Liner: Detect a release between the inner wall of the tank and the liner, and the liner must be compatible with the product stored.	X	X	
Piping (40 CFR 280.41(d) and.42(d))	Pressurized	Pressured piping must have (40 CFR 280.44): (1) An **automatic line leak detector** that detects leaks of 3 gallons per hour at 10 pounds per square inch line pressure within 1 hour; operations of the leak detector must be tested annually in accordance with the manufacturer's requirements; **AND** (2) Annual line tightness testing or monthly monitoring (*e.g.,* vapor monitoring, groundwater monitoring, interstitial monitoring, or other approved methods).	X	X	
	Suction	Suction piping must have (40 CFR 280.44): (1) Line tightness test every 3 years; **OR**	X	X	

Component	Type of Release Detection Monitoring	Release Detection Description	New Tanks	Existing Tanks	
		(2) Monthly monitoring methods such as vapor monitoring, groundwater monitoring, interstitial monitoring, or other approved methods. **NOTE**: No release detection is required for suction piping if it is designed and constructed to meet the requirements of 40 CFR 240.41(b)(II).			

10.2.1.4. Testing and Inspections. UST systems must be periodically inspected by qualified licensed contractors during normal operations and after certain repairs to verify proper operation and environmental compliance in accordance with Federal, state, and local requirements. The frequency of inspections must also be in accordance with applicable regulatory requirements. Examples of testing and Inspections include, but are not limited to:

10.2.1.4.1. Monthly: O&M vendor conducts an operation and maintenance “walkthrough inspection” of UST spill prevention and release detection equipment, which must be conducted and documented at least every 30-days. Checks include removing debris, looking for damage, loose caps, spills in interstitial space, and properly functioning alarms. Inspections and any testing shall be conducted in accordance with a standard developed by a nationally recognized association or independent testing laboratory as described in 40 CFR 280.36.

10.2.1.4.2. Annually: Leak Detection controls must be tested by the O&M vendor or by a qualified licensed third party contractor to check for proper performance which includes testing alarms and battery backup; checking probes and sensors; and testing automatic line leak detectors for compliance (§ 280.44(a)).

10.2.1.5. Tank Repairs (40 CFR 280.33). UST repairs shall be performed as needed to prevent releases due to structural failure or corrosion in the UST system. Approved repairs must comply with 40 CFR 280.33, and include the following:

- Conducted in accordance with a recognized tank industry standards or an independent testing laboratory;
- Fiberglass-reinforced plastic tanks may be repaired by the manufacturer's authorized representatives, in accordance with

nationally recognized association codes or practices, or independent testing laboratory;

- Replace metal pipe sections and fittings that have corroded or been damaged and resulting in a release (fiberglass pipes and fittings may be repaired in accordance with the manufacturer's specifications).
- Performed tank and piping tightness testing within 30 days of repairs; and
- Tested cathodic protection on a repaired tank system within 6 months of completing repairs.

11. Emergency Planning and Reporting

11.1. Spill, Prevention, Control, and Countermeasure (SPCC) Plans

GSA sites that store oil (as defined in 40 CFR 112.2) and meet the following criteria are required to prepare and maintain a SPCC Plan:

- Based on the location, the facility could reasonably be expected to discharge oil into or upon waters of the United States. See 40 CFR 120.2); ***and***
- The total aggregate aboveground oil storage ***capacity*** exceeds 1,320 gallons (calculation includes containers with a capacity of 55 gallons or more, even if not filled) **OR** the total underground FST capacity is greater than 42,000 gallons of oil.

11.1.1. Each SPCC Plan is unique to the facility, however each must minimally comply with the requirements of 40 CFR Part 112. The general requirements for the plan can be found in 40 CFR Part 112.7 which include the following:

- Description of the facility layout and diagram
- Operating procedures that the facility implements to prevent oil spills;
- Control measures installed to prevent oil from entering navigable waters or adjoining shorelines; and
- Countermeasures to contain, clean up, and mitigate the effects of an oil spill that has an impact on waters of the United States or adjoining shorelines.

11.1.2. Preparation and implementation of the SPCC Plan is the responsibility of the facility owner or operator but is often prepared by a contractor and certified by a licensed professional engineer. Facilities that meet the Tier I or II criterion have the option to self-certify their plan (40 CFR 112.3(g)).

11.1.3. SPCC Plans must be reviewed and evaluated at least every five years and amended to include more effective field-proven control or prevention technologies if they exist at the time of the review. In accordance with EPA regulations, the signed statement can be placed either at the beginning or end of the Plan or in a log or an appendix to the Plan. The following words will suffice, “I have completed review and evaluation of the SPCC Plan for (name of facility) on (date) and will (will not) amend the Plan as a result.” Plans must also be amended whenever there is a change in the facility design, construction, operation, or maintenance that affects the potential for an oil release (40 CFR 112.5). Completion of the plan review must be documented and can be satisfied by a signed statement as to whether the plan will be amended. Amendments must be made within six months of either of the aforementioned events. The SPCC Plan shall be tracked and maintained in the Certificate Module of the NCMMS.

11.2. **Release Reporting**

When a release from an RST system occurs, GSA designated personnel or representatives shall implement the site-specific spill response actions and initiate internal notification procedures. Releases include but are not limited to suspected releases (40 CFR 280.50), overfills and spills (40 CFR 280.53), and confirmed releases (40 CFR 280.61); In addition, personnel shall refer to the GSA Risk Management Notification Policy (PBS 2400.1) for GSA Risk Management Notification requirements.

11.2.1. Internal Release Reporting

In the event of a suspected release, overfill and spill, and/or confirmed release, on-site or field office personnel shall notify EHSF Managers at the time of discovery. EHSF Managers shall inform the GSA Risk Management Division of any releases subject to external reporting within 24 hours of discovery. Additional notifications include:

- The appropriate regulatory authorities as described below in External Release Reporting;
- The Office of Mission Assurance; and
- The Office of Architecture and Engineering. To aid in updates to the Building Information Modeling, asset and site-specific drawings, and planning for future project delivery.

11.2.2. External Release Reporting

Federal, state and local authorities may need to be notified if a spill or release meets certain criteria, including:

- EHSF Managers are responsible for assisting in determining if a release must be reported to external authorities and provide guidance on appropriate response activities.
- If your facility releases a hazardous substance (equal to or in excess of a reportable quantity (refer to 40 CFR 302.4) or an extremely hazardous substance (EHS) call the National Response Center (1-800-424-8802) within 24 hours. The threshold planning quantity for fuel is typically 10,000 pounds (40 CFR 355.30),
- For releases of an EHS over the threshold planning quantity, also notify the state emergency response commission (SERC), local emergency planning committee (LEPC), and local fire department.
- Facilities covered by a SPCC Plan must also report the following:
    - If your facility releases more than 1,000 gallons of oil in a single discharge, contact the Environmental Protection Agency (EPA) Regional Administrator within 60 days.
    - If your facility releases more than 42 gallons of oil in two discharges within any 12-month period, contact the EPA Regional Administrator within 60 days.
    - For either of the above SPCC Plan incidents, the EPA Administrator may require that the SPCC Plan be amended.

12. Tank Closure Requirements

Any RST system that does not meet the applicable performance standards or that has been out-of-service for more than one year, may be subject to continued monitoring and maintenance, upgrade or formal closure requirements. All tank removal, abandonment, and closure shall be conducted in accordance with applicable Federal, state, and local requirements and performed by contractors licensed to perform such work.

12.1. AST Closure Requirements

The closure of ASTs is primarily dictated by the local governing authority. Consult the state agency (or SPCC Plan) for specific requirements. Generally, if an AST has remained out of service for a year or more, many states require owners to maintain and monitor the tank, declare the tank inactive, or remove it. If the tank is declared inactive, substances are removed from the AST system (including pipes) and the inside of the tank is cleaned. Tanks are secured by bolting and locking all valves and capping all gauge openings and fill lines. Tanks are also clearly labeled with the date and the words “Out of Service.” Samples may be required when removing tanks to determine if any contamination has occurred. Most states require out-of-service tanks to be inspected and meet leak detection requirements before they are put back into service.

12.2. UST Temporary and Permanent Closure Requirements

USTs must be closed in accordance with (40 CFR 280 Subpart G). A UST that is out of service for up to 12 months is considered temporarily closed. When a UST has been temporarily closed for 12 months or more or if it cannot be upgraded to meet the new UST system requirements, it must be permanently closed. Listed

below are highlights of the requirements that must be performed during temporary and permanent closure. Refer to the cited reference for the full list of requirements.

Table 2. UST Closure

Initial UST Temporary Closure Activities (up to 12 Months)		Permanent UST Closure
Period of 0-3 Months	**Period of 3-12 Months**	**After 12 Months**
Continue O&M of corrosion protection; ***AND*** If tank is NOT empty -Continue operation of release detection; and -Report all suspected or confirmed releases.	Complete all activities required for 0-3 months. ***AND*** Leave vent lines open and functioning; and Cap and secure all other lines, pumps, manways, and ancillary equipment.	Permanently close the UST if it does not meet the new UST system performance requirements; **OR** Upgrade the UST to new standards or replace it with compliant UST.

The following are some steps that may be required to permanently close an UST:

- Notify appropriate regulatory authorities at least 30 days before permanent closure;
- Assess closure site for potential contamination;
- Empty and clean tank of all liquids and sludge;
- Remove tank from ground or fill tank with an inert solid; and
- Maintain closure documentation.

13. Administrative and Recordkeeping Requirements

13.1. National Computerized Maintenance Management System Records

The NCMMS is the system of record for the RST program. For the purpose of compliance with PBS Order 1095.2A, the NCMMS shall contain sufficient pertinent details to assess the compliance status of the RST program. This includes building identifying information, tank maintenance records, training, registration records, release prevention and response information, and a comprehensive inventory. This data may be housed in various sections within the NCMMS including as general asset information or in dedicated data fields, in PMs, Job Plans, Certificates, and as Specifications and Attributes.

In addition to the administrative records and work orders that are maintained in the NCMMS, some records associated with SPCC Plans or other release prevention and response plans, transfer procedures or signage, must also be readily available outside of the NCMMS as necessary such as the posting of signs on tanks. The Building Manager and COR are required to ensure that O&M vendor performs maintenance tasks and develops records specific to the tanks that they manage, and for verifying that the required data is maintained in the NCMMS.

13.2. **Training**

Records verifying completion of training or retraining for GSA and O&M vendor staff must be maintained in the NCMMS Certificates Module. The records, at a minimum, must identify the name of trainee, date trained, training topic, operator training class completed, the name of the trainer or examiner and the training company name, address, and telephone number. If applicable, state specific training guidelines are available by contacting GSA Environmental Program Managers.

Properties with GSA owned or operated USTs must also have O&M contractor personnel designated for each class of UST Operator. All UST Operators must successfully complete the appropriate operator training for their assigned operator class, as prescribed by the EPA in 40 CFR 280 Subpart J. Operator training must be evaluated via examination or practical demonstration. Based on the operator class, topics may include discussions on financial responsibility, familiarity with building, state and local emergency response procedures. (e.g., release notification, product transfer, overfill, shutoff, release response, SPCC Plan, etc.), product compatibility, recordkeeping, and various aspects of operations and maintenance. Training must meet the requirements of 40 CFR 280.242 listed below:

- Class A Operators – responsible for managing resources and personnel and performing activities such as establishing work assignments to achieve and maintain compliance with regulatory requirements. Requires knowledge and skills to make informed decisions through understanding the purpose, method and function of aspects of the tank operation, maintenance, and recordkeeping requirements for UST systems. Training must comply with 40 CFR 280.242 paragraphs (a)(1) and (2);
- Class B Operators – responsible for field implementation of applicable UST regulatory requirements and carries out day to day aspects of operating, maintaining, and recordkeeping for USTs. Requires knowledge and skills to recognize and implement applicable UST regulatory requirements for the assigned UST systems in accordance with all applicable sections of 40 CFR 280. Training must comply with 40 CFR 280.242 paragraphs (b)(1) and (2); and
- Class C Operators – responsible for the first line of response when emergencies occur. Requires knowledge of actions to take (including notifying appropriate authorities) in response to emergencies or alarms caused by spills or releases from the operation of a UST system. Training must comply with 40 CFR 280.242 paragraphs (c)(1) and (2)

All AST operators (typically oil-handling personnel) must be familiar with their site-specific filling and spill response procedures including:

- Operation and maintenance of equipment to prevent discharges; response procedures;
- Applicable laws, rules, and regulations;

- General facility operations; **AND**
- If the facility is subject to the requirements of a SPCC Plan, personnel must be trained on release prevention topics in accordance with 40 CFR 112.7 (f); and
    - Contents of the SPCC Plan; and
    - Annual briefings to ensure understanding of the SPCC Plan.

13.3. Maintenance Records and Guides

The building management staff shall ensure that records of maintenance performed on RSTs by O&M contractors are maintained in the NCMMS and that Preventive Maintenance Guides contain job plans for all recurring environmental regulatory related maintenance and administrative federal compliance related activities. Sample RST activities records that must be maintained include all testing and repairs performed on tank systems, and any operational guidance documents (e.g., filling procedures, training, tank registration and spill prevention and response plans). When tank registration is required, include a copy of registration form, expiration and renewal information, and renewal due date notification in NCMMS Certificate Module. Records to be maintained include:

- Copies of tank notifications and reports to Federal and state agencies (e.g., installation, closure, leaks, spills, EPCRA, Tier II Reports, etc.);
- Scheduled ongoing data reviews, inspections, leak detection tests and repairs and records of the same;
- Copies of UST Operator training certificates;
- Written reporting procedures for notifications of releases and data tracking and work orders related to SPCC Plans or written plans for other release mitigation and responses (including documentation of annual reviews);
- PM Guides to include recurring activities such as but not limited to inspections, permits/registration renewal, training renewal;
- Written Filling/transfer procedures;
- Records of tanks that need or have planned upgrades, replacements, closure; and
- Records of internal reporting of RST related data to the EHSF Office.

13.4. Tank Inventory

Building Managers shall develop and maintain within the NCMMS a comprehensive inventory of all RSTs at GSA-controlled federally owned facilities. The inventory will contain the information described below. The inventory shall be updated as needed to ensure that the recorded data reflects the most current conditions related to each tank. The inventory of tanks located in facilities where GSA has delegated O&M authority to the occupant agency will be maintained electronically by that agency and made available to OFM Facilities Operations Office upon request. The minimum data required for the GSA maintained tank inventory is listed in Table 3 below.

Table 3. Required Tank Inventory data points and Attributes in NCMMS

Data Point / Attribute Code	Description	Where to enter data In NCMMS
TNK-CONTAINMENT	Tank Secondary Containment - Double Wall, Rupture Basin, Vaulted, etc. (pick-list)	Asset Application / Specifications Tab
TNK-CONTENT	Tank Contents - Diesel, Fuel Oil,Hydraulic, Gasoline, Air, Refrigerant gas, LP Gas, Used Oil, etc. (pick-list)	Asset Application / Specifications Tab
TNK-LEAK-DETECT	Tank Leak Detection - Automatic Tank Gauging, Inventory Control, Manual Gauging, Visual, etc. (pick-list)	Asset Application / Specifications Tab
TNK-MATERIAL	What material is the tank constructed of? - FRP, Aluminum, Steel, etc. (pick-list)	Asset Application / Specifications Tab
TNK-PIPE-MONITOR	Pipe Monitoring Type - Interstitial Monitoring, Auto Shut-off, Alarms, Manual Gauge, etc. (pick-list)	Asset Application / Specifications Tab
TNK-PIPE-FEED	Piping type - Suction, Pressurized, Gravity, etc. (pick-list)	Asset Application / Specifications Tab
TNK-CATH-PROTEC	Cathodic Protection - Tank only, Tank and Piping, Piping only, None, etc. (pick-list)	Asset Application / Specifications Tab
TNK-PURPOSE	What is content used for? - Emergency Generator, Heating, etc. (pick-list)	Asset Application / Specifications Tab
TNK-SPCC-PLAN	SPCC Plan is required if total aboveground storage capacity for all oil/fuel is equal to or more than 1320 GL. eg..No, Yes, Other Spill Plan, etc. (pick-list)	Asset Application / Specifications Tab
TNK-REGULATED	Is Tank Regulated by Federal, State or Local Agency? (pick-list)	Asset Application / Specifications Tab
TNK-SIZE-GL	Tank Size in Gallons (Capacity) (numeric free type field)	Asset Application / Specifications Tab
TNK-PIPE-2NDARY	Tank Pipe Secondary Containment - Double Walled Piping, Visual Inspection Only, Safe Suction, etc. (pick-list)	Asset Application / Specifications Tab
TNK-SPILL-OVER	Spill and Overfill - Spill Basin or Buckets, Automatic Shut-off, etc. (pick-list)	Asset Application / Specifications Tab
TNK-EPA-STATUS	Tank EPA Regulatory Operational Status - Currently In Use, Abandoned in Place, Temp. Out of Service, Removed, etc. (pick-list)	Asset Application / Specifications Tab
TNK-TYPE	Tank Type (UST, AST, Emergency Generator Tank, etc.) (pick-list)	Asset Application / Specifications Tab
TNK-SVC-END-DT	Date tank taken out of service - Closed in Place Date, Temporarily Out-of-Service Date, Removed Date, etc. (pick-list calendar)	Asset Application / Specifications Tab
Installation Date	When was the tank installed? (pick-list calendar)	Asset Tab / Purchase Information
ASSET ID	Asset ID	Asset Tab

Location	Where is the tank located? Penthouse, basement, tank room, garage, outside, etc. (pick-list)	Asset Tab / Review Details
Reviewer Comments	Open data entry field for comment (free type, 100 characters)	Asset Tab / Review Details

13.5. **Records Retention**

The NCMMS is the system of record and repository for all maintenance and environmental compliance-related administrative records. Table 4 below provides a general summary of records retention periods. Other records shall be maintained in accordance with the GSA Records Retention Schedule. For the purposes of compliance and in the event of an internal or external inspection, review or audit, all required records needed to demonstrate compliance with Federal, state, and local regulatory requirements shall be readily available at the RST site. Records shall be periodically reviewed as outlined in the Job Plans within the NCMMS.

Table 4. RST Records Retention Timelines

AST Operation Records	**State/Local Retention Requirement**	**PBS Records Retention Requirement**
Corrosion Protection Equipment Operations; AST System Repairs; Tank Closure, and other Operation Records as required	Dependent on state/local regulations; consult with appropriate governing agencies	Destroy 30 years after the end of FY in which the record was created or 10 years after the building is disposed of, whichever date is sooner.
AST Release Detection Records	**State/Local Retention Requirement**	**GSA Policy Requirement**
Manufacturer's Written Performance Claims; Sampling, Testing or Monitoring Results; Calibration, Maintenance, and Repair of Release Detection Equipment Documentation; Required Calibration and Maintenance Schedules (provided by the release detection equipment manufacturer)	Dependent on state/local regulations; consult with appropriate governing agencies	Destroy 30 years after the end of FY in which the record was created or 10 years after the building is disposed of, whichever date is sooner.
UST Operation Records	**Federal Retention Requirement**	**GSA Policy Requirement**
Expert Analysis of Potential Site Contamination	No retention period established	Destroy 30 years after the end of FY in which the record was created or 10 years after the building is disposed of, whichever date is sooner.
Corrosion Protection Equipment Operations	Results of (1) the last 3 inspections; ***and*** (2) testing from the last 2 inspections	Destroy 30 years after the end of FY in which the record was created or 10 years after the building is disposed of, whichever date is sooner.
UST System Repairs	Operating life of the UST system	Destroy 30 years after the end of FY in which the record was created or 10 years after the building is disposed of, whichever date is sooner.
Permanent Closure Site Investigation and Notices of No Further Action	3 years after permanent closure	Destroy 30 years after the end of FY in which the record was created or 10 years after the building is disposed of, whichever date is sooner.
UST Release Detection Records	**Federal Retention Time**	**GSA Retention Time**
Manufacturer's Written Performance Claims	5 Years	Permanent. Cut off at the end of the fiscal year when building is sold,

		transferred, closed, or otherwise disposed of. Transfer to NARA 15 years after cutoff.
Sampling, Testing, or Monitoring Results	1 Year	Destroy 30 years after the end of FY in which the record was created or 10 years after the building is disposed of, whichever date is sooner.
Calibration, Maintenance, and Repair of Release Detection Equipment Documentation	1 Year	Destroy 30 years after the end of FY in which the record was created or 10 years after the building is disposed of, whichever date is sooner.
Required Calibration and Maintenance Schedules (provided by the release detection equipment manufacturer)	5 Years	Destroy 30 years after the end of FY in which the record was created or 10 years after the building is disposed of, whichever date is sooner.

Resources

Topics	Applicable Laws & Regulations
Underground Storage Tanks (USTs); Installation and Design; Operating Requirements; Corrosion Protection, Repair and Release Reporting; Release Detection, Recordkeeping, Temporary and Permanent Closure	Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (UST) (40 CFR Part 280)
Aboveground Storage Tanks (ASTs); Bulk Storage Containers; Spill Prevention, Control and Countermeasures (SPCC) Plan; Secondary Containment; Testing and Inspection	Oil Pollution Prevention (40 CFR Part 112)
Hazardous Substance Release Reporting, Hazardous Chemical Use Notifications, Threshold Planning Quantity, Emergency Release Notification, Hazardous Chemical Reporting	Designation, Reportable Quantities, and Notification (40 CFR Part 302) Emergency Planning and Notification (40 CFR Part 355) Hazardous Chemical Reporting: Community Right-To-Know (40 CFR Part 370)
Content	**Additional Resources**
EPA UST Information Website	EPA Office of Underground Storage Tanks
GSA General Information; Overview	PBS Risk Management Division Home Page
Acronyms and Definitions	PBS Order 1095.2A, and Definitions section of any cited regulation

Related Publications

The following list of publications includes standards applicable to the installation, operation and maintenance, and decommissioning of RSTs.

Statutes

1. The Oil Pollution Act (OPA) of 1990; 33 U.S.C. 2702 et seq..
2. CWA; 33 U.S.C. § 1251 et seq. (1977).
3. RCRA; 42 U.S.C. § 321 et seq. (6901).

Code of Federal Regulations

1. 40 CFR Part 110, Discharge of Oil.
2. 40 CFR Part 112, Oil Pollution Prevention.
3. 40 CFR Part 280, Technical Standards and Corrective Action Requirements for Owners and Operators of UST.
4. 29 CFR Part 1926, Safety and Health Regulations for Construction.

Executive Orders

1. E.O. 12088 – Federal Compliance with Pollution Control Standards.

Consensus Standards – NFPA

1. NFPA 1 – Fire Code.
2. NFPA 30 – Flammable and Combustible Liquids Code.
3. NFPA 30a – Code for Motor Fuel Dispensing Facilities and Repair Garages.
4. NFPA 31 – Standard for Installation of Oil Burning Equipment.
5. NFPA 37 – Installation/Use of Stationary Combustion Engines.
6. NFPA 58 – Liquefied Petroleum Gas Code
7. NFPA 704 – Standard System for the Identification of the Hazards of Materials for Emergency Response
8. NFPA 110 – Emergency and Standby Power Systems.

Consensus Standards – International Code Council

1. International Building Code.
2. International Fire Code

Consensus Standards – American Petroleum Institute (API)

1. RP 545 – Recommended Practice for Lightning Protection of Aboveground Storage Tanks for Flammable or Combustible Liquids.
2. RP 574 – Inspection Practices for Piping System Components.
3. RP 575 – Inspection of Atmospheric and Low Pressure Storage Tanks.
4. RP 1604 – Closure of Underground Petroleum Storage Tanks.

5. RP 1615 – Installation of Underground Petroleum Storage Tanks.
6. RP 1621 – Bulk Liquid Stock Control at Retail Outlets.
7. RP 1632 – Cathodic protection of underground petroleum storage tanks and piping systems.
8. RP 2003 – Protection against Ignitions Arising out of Static, Lightning and Stray Currents.
9. RP 2350 – Overfill Protection for Storage Tanks in Petroleum Facilities.
10. STD 510 – Pressure Vessel Inspection Code (Maintenance Inspection Rating Repair and Alteration).
11. STD 650 – Welded tanks for oil storage.
12. STD 653 – Tank Inspection, Repair, Alteration, and Reconstruction.
13. STD 1631 – Interior Lining and Periodic Inspection of Underground Storage Tanks.
14. STD 2000 – Venting Atmospheric and low-pressure storage tanks.
15. STD 2015 – Requirements for Safe Entry and Cleaning of Petroleum Storage Tanks.
16. Publication 327 – Aboveground Storage Tank Standards: A Tutorial.
17. Publication 334 – A Guide to Leak Detection for Aboveground Storage Tanks.
18. Publication 910 – Digest of State Boiler, Pressure Vessel, Piping and Aboveground Storage Tank Rules and Regulations.
19. Publication 1571 – Diesel Fuel—Questions and Answers for Highway and Off-Highway Use.
20. Publication 1628 – A Guide to the Assessment and Remediation of Underground Petroleum Releases.
21. Publication A1632S – Cathodic Protection of Underground Petroleum Storage Tanks and Piping Systems.
22. Spec 12P – Specifications for Fiberglass Reinforced Plastic Tanks.

Consensus Standards – Steel Tank Institute (STI)

1. STI P3 – Specification and Manual for External Corrosion Protection of Underground Steel Storage Tanks.
2. STI F894 – Act-100® Specification for External Corrosion Protection of FRP Composite Steel USTs.
3. STI F921 – F921 Standard for Aboveground Tanks with Integral Secondary Containment.
4. STI F941 – Standards for Fireguard® Thermally Insulated Aboveground Storage Tanks.
5. STI F961 – ACT-100U Specification for External Corrosion Protection of Composite Steel Underground Storage Tanks.
6. STI SP001 – Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids.
7. STI SP031 – Standard for Repair of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible & Flammable Liquids.
8. STI R821 – sti-P3 Installation Instructions.
9. STI R891 – RP for Hold Down Strap Isolation.
10. STI R892 – RP for Corrosion Protection of Underground Piping Networks Associated with Liquid Storage and Dispensing Systems.
11. STI R912 – Installation Instructions for Shop Fabricated Aboveground Storage Tanks for Flammable, Combustible Liquids.
12. STI R913 – Act-100 Installation Instructions.
13. STI R942 – Fireguard Installation & Testing Instructions for Thermally Insulated, Lightweight, Double Wall Fireguard Aboveground Storage Tanks.

14. STI R971 – ACT-100-U® Installation Instructions.
15. STI R972 – RP for the Addition of Supplemental Anodes to sti-P3® USTs.

Consensus Standards – Petroleum Equipment Institute (PEI)

1. RP 100 – Installation of Underground Liquid Storage Systems.
2. RP 200 – Installation of Aboveground Storage Systems.
3. RP 600 – Overfill Prevention for ASTs.
4. RP 900 – UST Inspection and Maintenance

Consensus Standards – ASTM

1. A185 – Welded Steel Wire Fabric for Concrete Reinforcing.
2. A615 – Deformed and Plain Billet-Steel Bars for Concrete Reinforcing.
3. C33 – Concrete Aggregates-Deleterious Substances.
4. C94 – Ready-Mixed Concrete.
5. C150 – Portland Cement.
6. C260 – Air-Entraining Admixtures for Concrete.
7. C494 – Chemical Admixtures for Concrete.
8. D1556 – Density of Soil in place by the Sand-Cone Method.
9. D1557 – Moisture-Density Relations of Soils.
10. D4021 – Glass Fiber Reinforced Polyester Underground Petroleum Storage Tanks.

Consensus Standards – Underwriter Laboratories (UL)

1. UL Standard 125 – Flow Control Valves for Anhydrous Ammonia and LP-Gas.
2. UL Standard 142 – Standard for Safety for the Aboveground Storage of Flammable and Combustible Liquids.
3. UL Standard 971 – Nonmetallic Underground Piping for Flammable Liquids.
4. UL Standard 1316 – Standard for Safety Glass-Fiber-Reinforced Plastic Underground Storage Tanks for Petroleum Products.
5. UL Standard 1746 – Standard for Safety: External Corrosion Protection Systems for Steel Underground Storage Tanks.
6. UL Standard 2085 – Standard for Safety Protected Aboveground Tanks for Flammable and Combustible Liquids.