



New  
Jersey  
Department of  
Environmental  
Protection

COMPLIANCE ADVISORY

# Enforcement **Alert**

*Making You Aware of Anticipated Enforcement Activities*

Compliance and Enforcement

Issued: November 1, 2012

# 2012-17

## **DEP Guidance and Recommendations for Restarting Fuel Tank Operations after Flooding**

### **Who is affected by this initiative?**

All facilities with Underground Storage Tanks (USTs), including Gasoline Service Stations, that have been flooded as a result of Hurricane Sandy.

### **What is occurring?**

In the aftermath of Hurricane Sandy a significant amount of Underground Storage Tank facilities (Primarily Gasoline Service Stations) that store and distribute fuel have been disabled. The flood water, loss of power and wind damage may have compromised the facilities ability to store and dispense fuel safely.

### **What is DEP doing?**

DEP is recommending that any facility that has been flooded follow the American Petroleum Institute (API) **Guidance for Restarting Fuel Tank Operations after Flooding**, below.

### **What should I do?**

**American Petroleum Institute Guidance - Options for Consideration: Opening a Service Station after Flooding.** Note that this list is not intended to be a complete checklist. In general, after severe flooding, serious consideration should be given to having a system test similar to a test done for a new installation completed by a competent technician. All suggestions may not necessarily be applicable to every station or situation and therefore may not be required.

#### **DOs:**

- Check electrical system for continuity and shorts (pumps, turbines, dispensers, emergency shutoff, panel box, etc.)
- Check Critical safety devices (e.g., shear valves, stop switches, isolation relays on dispensers, etc.)
- Check tank bottoms for water and debris (due to surface infiltration) \*
- Check tightness testing of tanks

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- Check deflection of fiberglass tanks. If deflection is greater than manufacturer's specification (general guideline is 2%), call the manufacturer for instruction
- Check cathodic protection system to ensure it is connected and operational
- Flush dispensers and entire UST system with nitrogen (or some other inert gas)
- If tanks shifted and problems are found, repair them according to appropriate industry standards (API 1615 and NFPA 30 and 30A) and regulations (40 CFR 280)
- Follow proper procedures for calibrating tank inventory charts (SIR tank angle)

## **Dispenser/Lines**

- Check vents for blockage and proper operation
- Eliminate water in dispenser sumps, pans, tank sumps, etc. (Sump water should be removed by an authorized and/or state licensed waste hauler to be taken to an appropriate treatment facility.)
- Check vent and vapor lines (Stage II) for movement and cracking
- Check all Stage II system equipment (e.g., filters, screens, etc., for the presence of dirt, mud, etc.)
- Check dispenser filters and submersible check-valve screens for plugging with dirt or mud
- Check tightness testing of piping

## **Monitoring Equipment**

- Check pressure transducers on product line leak detectors (ensure no water infiltration)
- Check monitoring wells for contamination
- Check with vendors for recommendations on proving equipment
- Ensure that communication system working related to any remote monitoring (GVR and the FMS)
- Ensure security systems are in place (cameras and alarm functions)

## **Miscellaneous**

- Treat and dispose of any hazardous waste (i.e., gasoline contaminated water or water contaminated gasoline) according to applicable federal (i.e., Resource Conservation and Recovery Act and its attendant regulations) and state laws and regulations
- Ensure payment process is functioning
- Ensure adequate lighting on forecourt
- Clear all stormwater drains of debris
- Notify authorities as appropriate

## **DON'Ts:**

- DO NOT receive new product until system integrity is proven
- DO NOT assume everything is okay because water didn't actually flood over station. The water table could have risen and caused problems

\* Stick tank or read automatic tank gauge system to determine whether water has entered the UST. If using ethanol as an oxygenate in your fuels, determine whether ETOH phase-shift has occurred (use an ethanol-water detecting paste). If water is in the tank and ethanol is not an oxygenate, have the water pumped from your UST by a licensed and approved waste hauler to be taken to an appropriate treatment facility. If ethanol is used as an oxygenate and a phase-shift has occurred, which could happen with 5-6 inches of water) consider pumping the UST completely. Again have the water pumped from your UST by a licensed and approved waste hauler to be taken to an appropriate treatment facility.

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## Who should I contact with questions?

### **During Business Hours:**

New Jersey Department of Environmental Protection  
Hazardous Waste and Underground Storage Tank Enforcement  
PO Box 420  
Mail Code 401-04B  
Trenton, NJ 08625-0420  
609-943-3019

**Northern Region:** Bergen, Essex, Hudson, Hunterdon, Morris, Passaic, Somerset, Sussex, Union, and Warren Counties:

Contact John Olko, Supervisor at 609-851-7989 or email at [john.olko@dep.state.nj.us](mailto:john.olko@dep.state.nj.us)

**Southern Region:** Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester, Mercer, Middlesex, Monmouth, Ocean, and Salem Counties:

Contact Len Lipman, Supervisor at 609-221-3996 or email at [Leonard.Lipman@dep.state.nj.us](mailto:Leonard.Lipman@dep.state.nj.us)

**Non-Business Hours:** 1-877-WARNDEP (1-877-927-6337)

## Where can I get more information?

Hurricane Event Information: <http://www.nj.gov/dep/special/hurricane-sandy/>

General NJDEP contact information: <http://www.nj.gov/cgi-bin/dep/contactdep.pl>

USEPA Underground Storage Tank Flood guide:  
<http://www.epa.gov/oust/pubs/ustfloodguide.htm>

To comment on this advisory, please visit: <http://www.nj.gov/dep/enforcement/survey.html>

Please note this advisory is intended to be a summary explanation of a department initiative. It does not include all potentially applicable requirements. If you have any questions related to compliance with this initiative, please contact the contact numbers listed above.