How to Comply with State AST Rules and Avoid Petroleum Discharges to the Environment



Mott-Smith Consulting Group, LLC

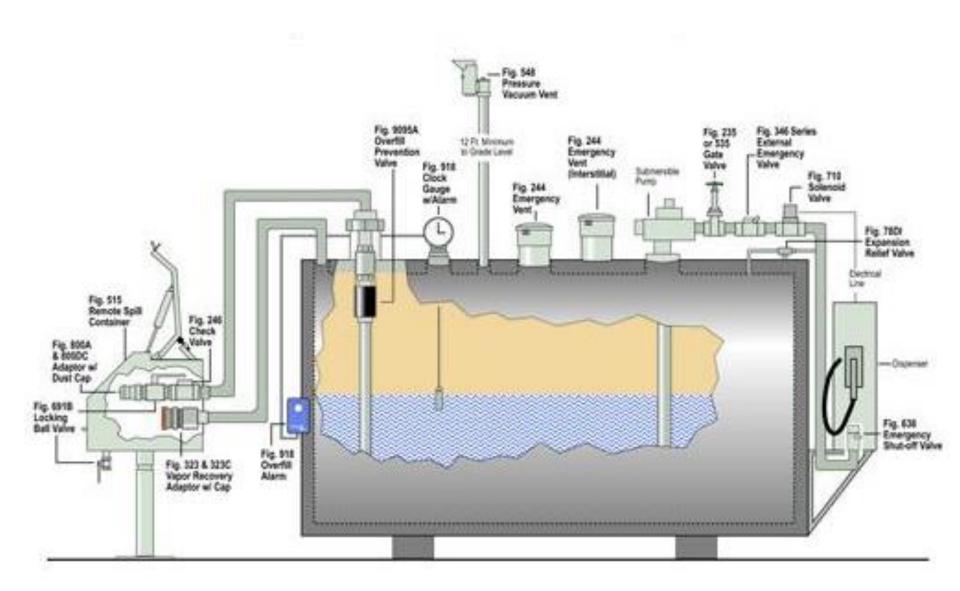


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States Regulate and Inspect Storage Tank Systems







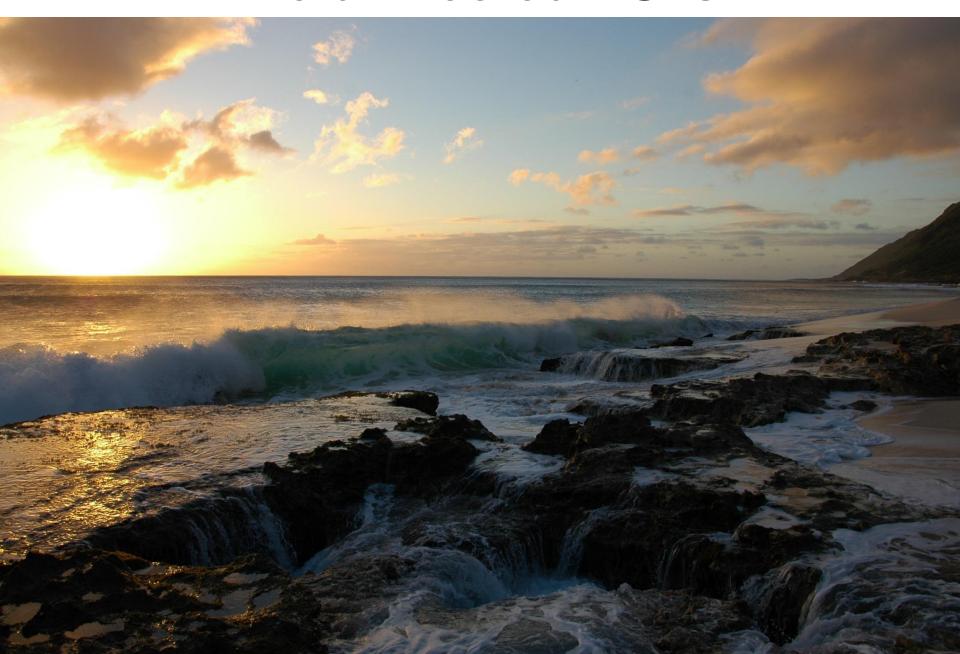
Industry Reference Standards – The Technical Foundation of State Regulations

- ACI American Concrete Institute.
- API American Petroleum Institute.
- ASME American Society of Mechanical Engineers
- ASTM American Society for Testing and Materials.

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- NACE National Association of Corrosion Engineers.
- NFPA National Fire Protection Association.
- PEI Petroleum Equipment Institute.
- SSPC Society for Protective Coatings.
- STI Steel Tank Institute.
- UL Underwriters Laboratories.

Field-Erected ASTs











Piping Connections, Sumps, Manways, & Shell Penetrations



Reference Standards-API-650





































API 650 Optional/Traditional Double-Bottom Designs

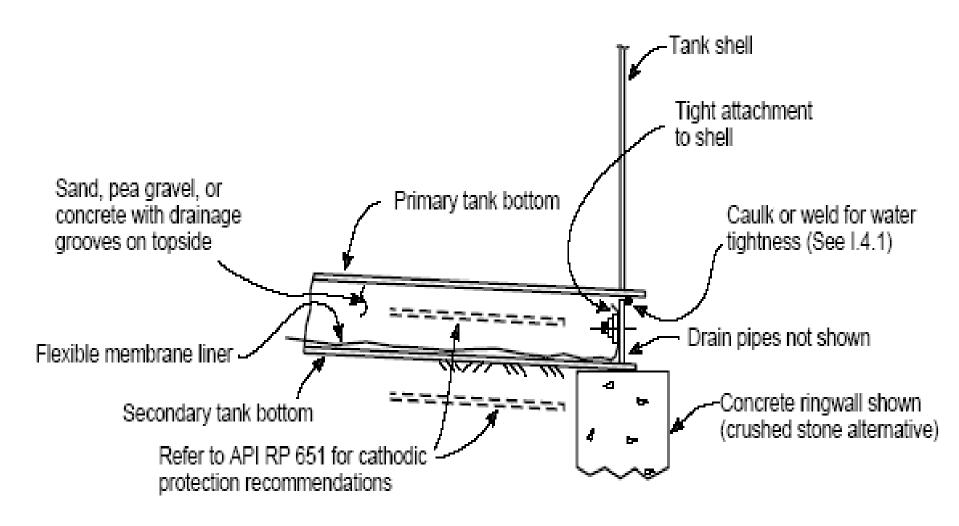


Figure I-4—Double Steel Bottom with Leak Detection at the Tank Perimeter (Typical Arrangement)





El-Segundo Designs

- Cone-up
- Cone-down
- Shovel-bottom







Impervious Synthetic Liners Beneath the Tank



Upgrading Existing
Single-Bottom
ASTs
with Secondary
Containment







Internal Secondary Containment Using Parabeam









Tankbau (Germany) Internal Secondary Containment System





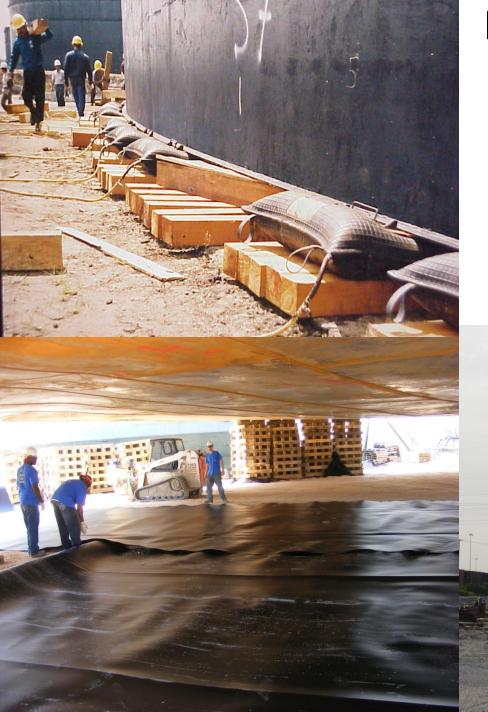






Tank-Jacking to Install Secondary Containment



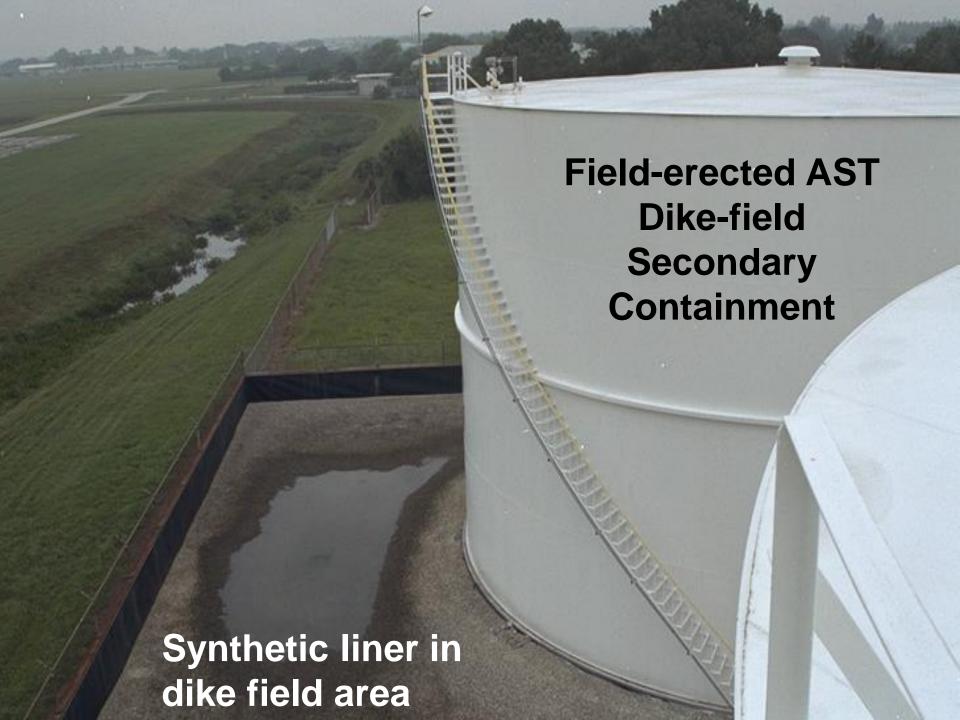


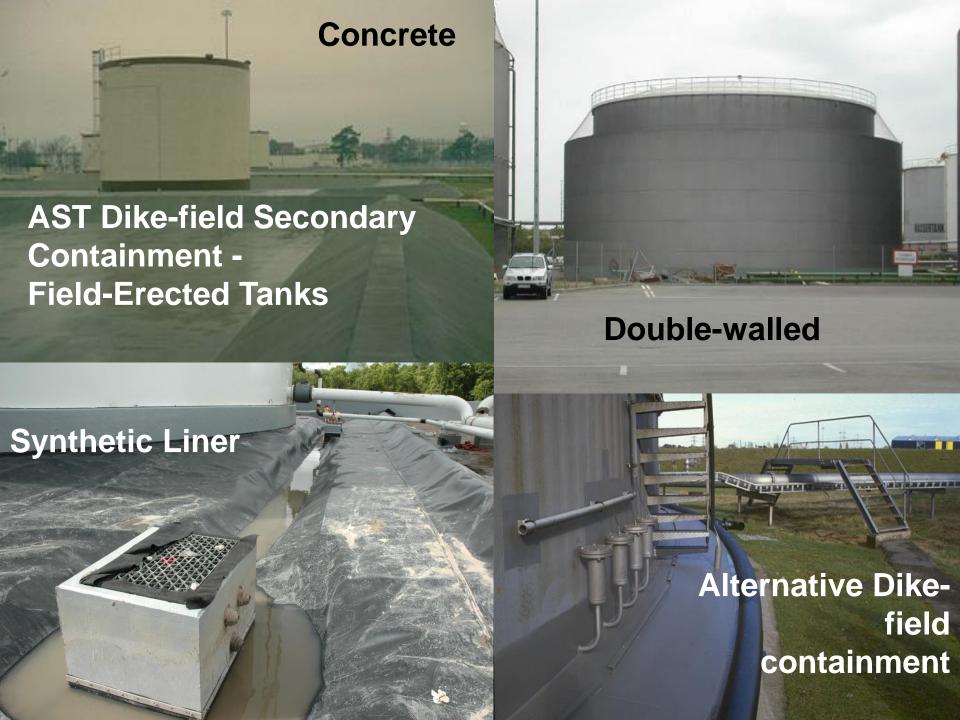
Field-erected AST Lifting for secondary containment installation beneath the tank

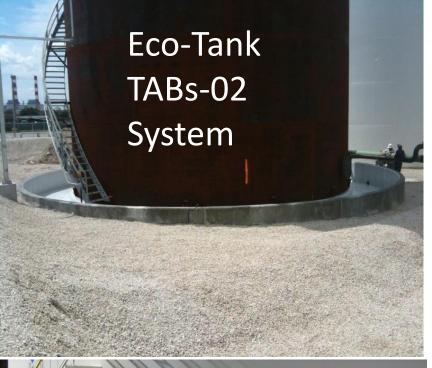




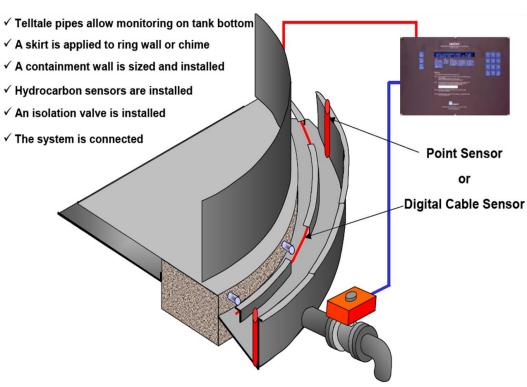












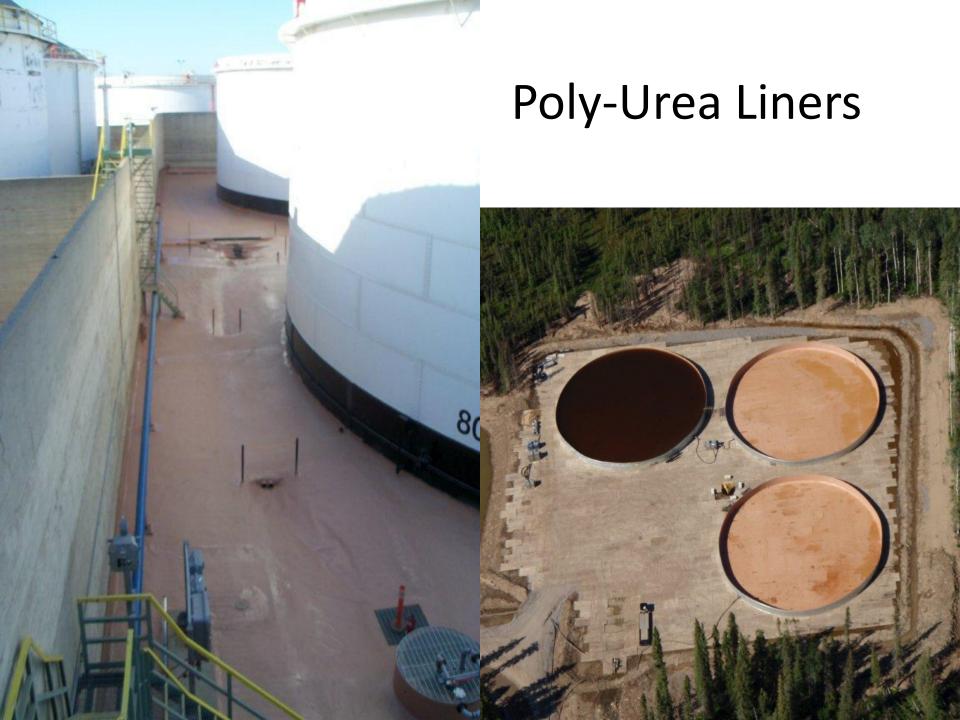
Alternative
Dike Field
Secondary
Containment



Pre-Hydrated Bentonite Clay Liners – "Rawmat" by Rawell













Issues in selecting the type of shop-fabricated tank best-suited for your needs:

- Storage volume needed
- Site security
- Available space
- Piping needs
- Dispensing needs
- Portability
- Regulation
- Cost
- Operation and maintenance issues
- •Risk assessment fire safety, hurricanes, etc





06/22/2007

Shop-fabricated ASTs should have secondary containment at the time of installation





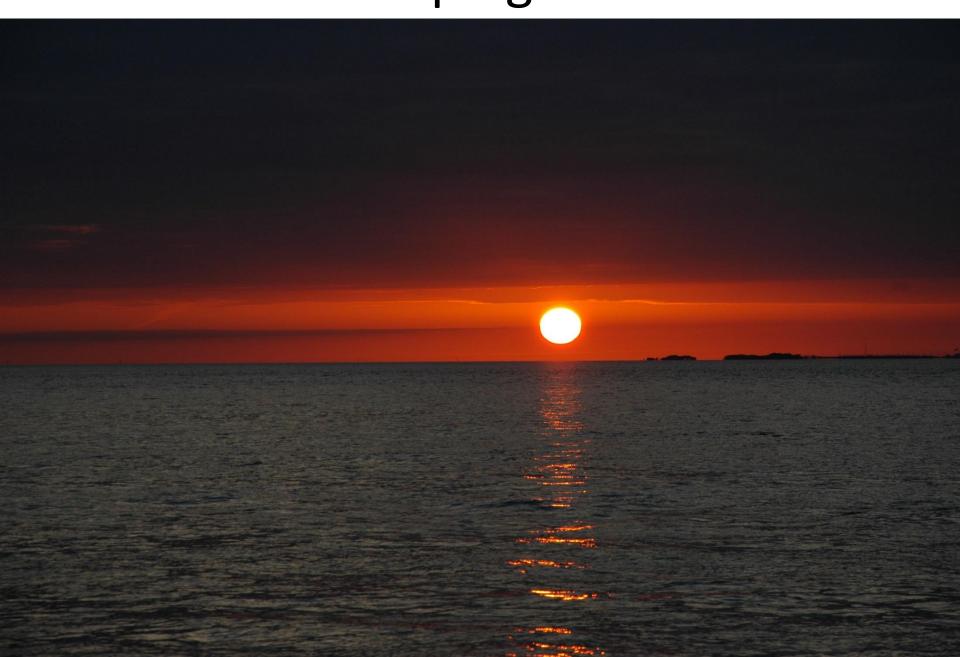


AST Secondary Containment - Shop-fabricated Tanks





Piping





The major source of Field-erected









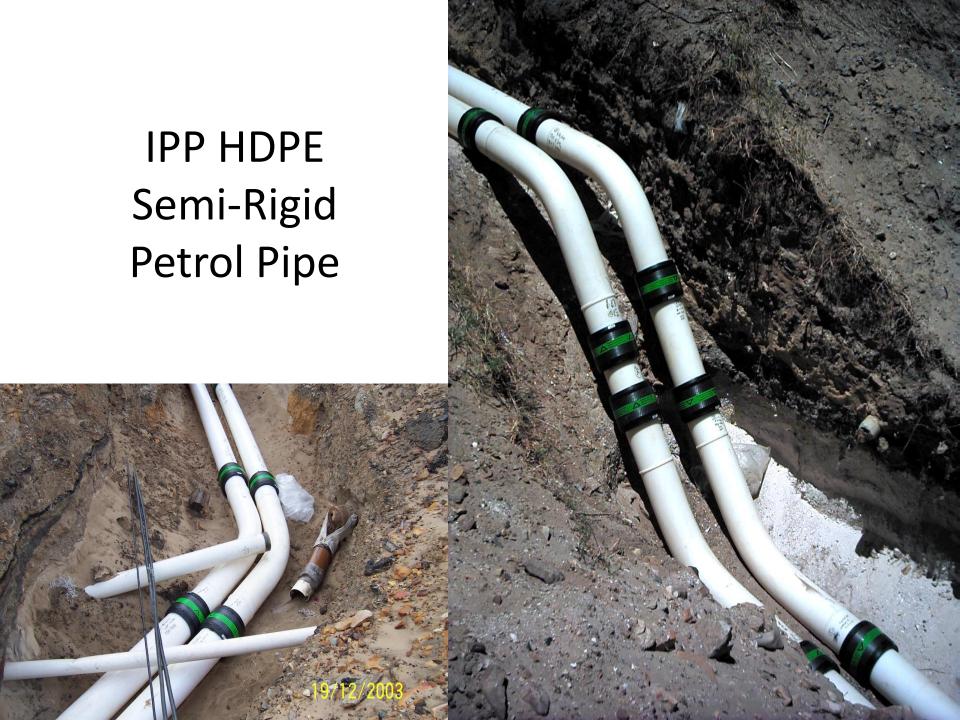


Steel Bulk Product
Piping with
Secondary
Containment for
Piping in Contact
with the Soil



Steel Bulk Product Piping with Secondary Containment - Installation concerns









AST Overfill Protection



GAUGE HT MAX. FILL MIN. FILL LINE DISP. 12:43pm

















Internal Release Detection for Single-wall Systems

NONE

External Release Detection for Single-wall Systems

- Well construction
- Site Suitability
- Groundwater monitoring wells
- Vapor monitoring wells





Release Detection for Double-wall Systems

Internal
Interstitial
Monitoring



- Hydrostatic
- Sensors & Probes





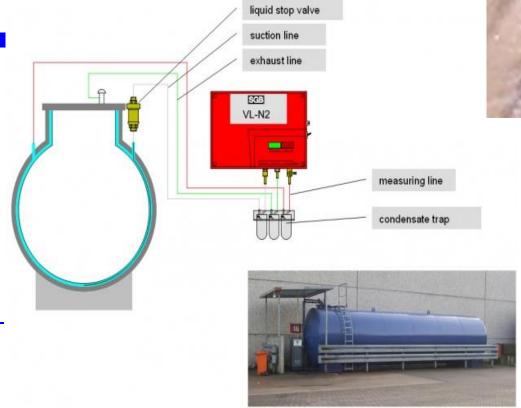
Recommendation for Release Detection...

"First Class" Version

The "Economy" Version

Vacuum or Pressure Continuous







Visual Inspections!



General Operation & Maintenance

Piping connection drip-protection



Stormwater Management

Stormwater retention and removal, and dike field liners







Unusual Situations



- RecordKeeping
 •Keep a spiral notebook of visual inspections
- Keep a tabbed notebook of all other records required by the State
- Photo-document if possible
- Keep Registration Information up-to-date

Commercially available recordkeeping systems





Out-of-Service and Closure Requirements











Recommendation: Hire a qualified, experienced professional environmental consulting firm



Incident and Discharge Reporting

Discharges

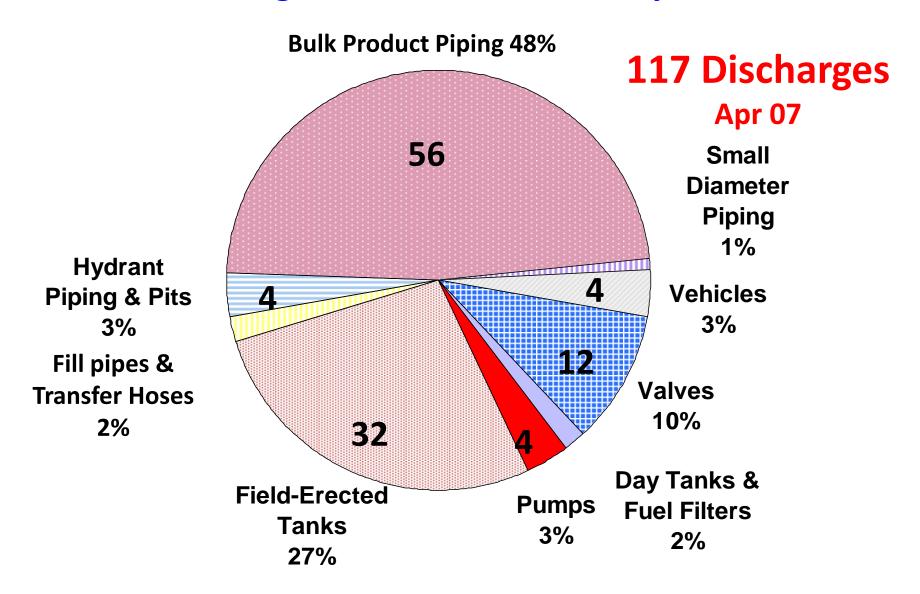
Incidents



Release or Discharge Response – Complete discharge form within 24 hours or the close of the next business day – control and abate the discharge

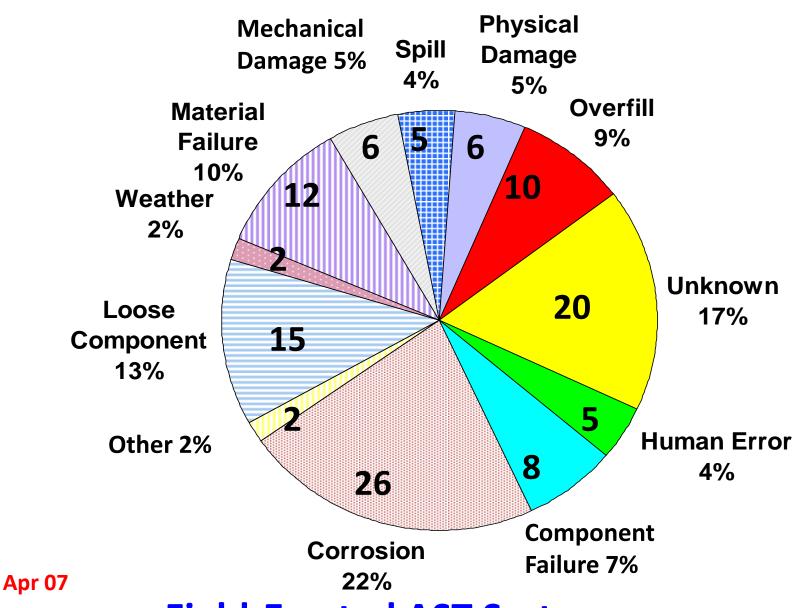


Sources of Discharges - Field-Erected AST Systems



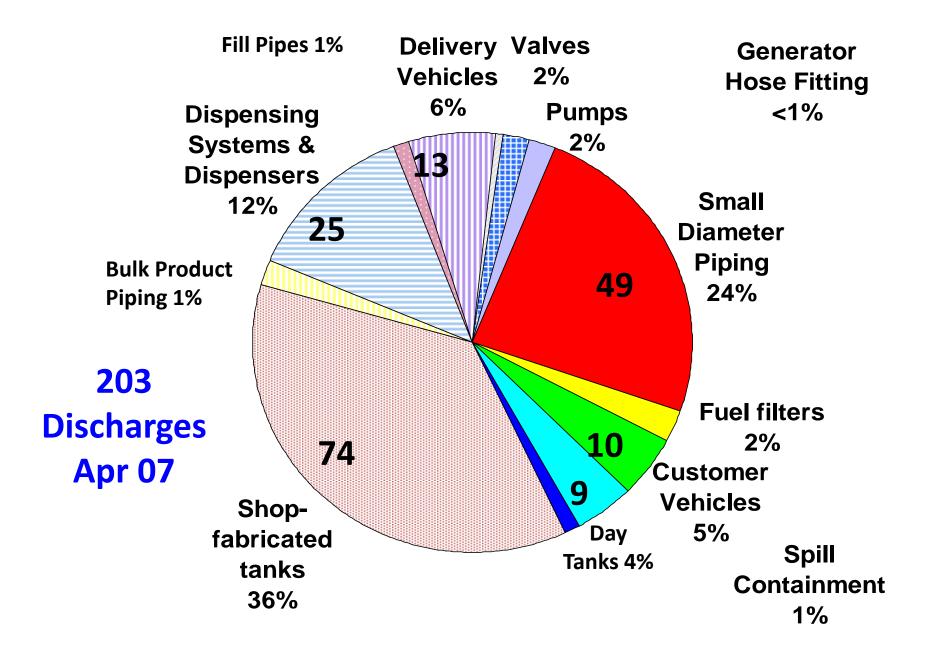
Tanks are only 17% if overfills and other external factors are excluded

Causes of Discharges from All Sources

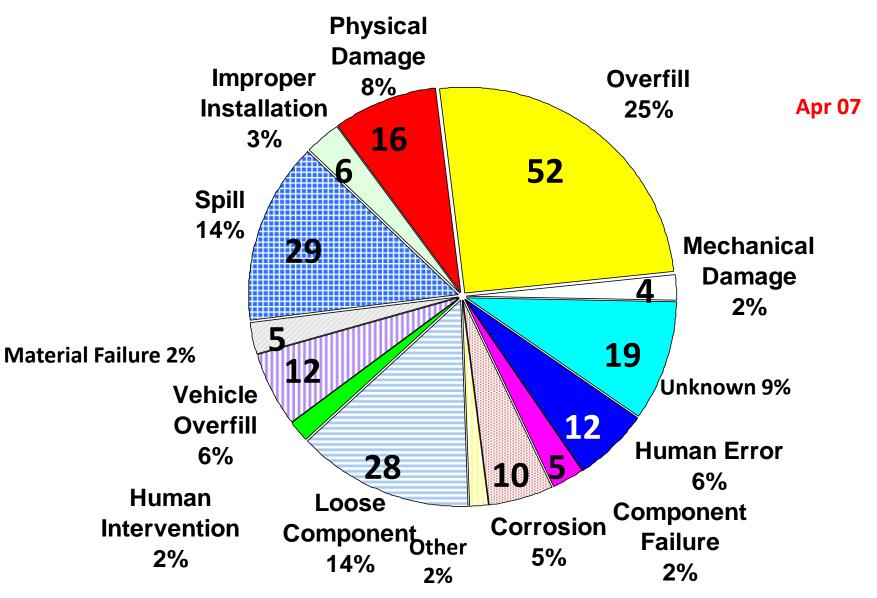


Field-Erected AST Systems

Sources of Discharges - Shop-fabricated ASTs



Causes of Discharges from All Sources



Shop-fabricated AST Systems

Shop-Fab Fires & Explosions









The End

