

## 2013/14 Compliance Packet

The 2013/2014 compliance packets from Kansas Department of Health and Environment (KDHE) that you should have received in October contained the following:

- Forms for documentation of leak detection
- Annual inventory control summary form
- A new log form if you have a rectifier
- Registration form for operator training (for owners and operators that have not yet taken the class)
- Instructions for all the forms
- Deadline for mailing forms

Please review your packet closely and also make a note on your calendar for February 28<sup>th</sup> – **COMPLIANCE REPORTS DUE TO KDHE TODAY!**

We stress the importance of filing your compliance report by the deadline for these reasons:

1. Failure to comply may result in fines.
2. If too many locations fail to comply it may result in more rules and heavier fines.
3. Missing the February 28<sup>th</sup> 2013 deadline may result in a facility not getting their 2013/14 permit and **not being able to get fuel deliveries.**
4. If you have missed this deadline you may have to have additional testing done to prove compliance.

There are more reasons but the 5 above are the ones about which TMS most often hears.

Mail your packet to KDHE as soon as you can but most importantly be sure to mail so KDHE receives them by February 28<sup>th</sup>.

## TMS at PACE

The TMS will be at PACE in booth 355, Stop by if you have any questions or just say hi. Your friendly KDHE tanks group will be in booth 174 you can visit them as well.

PACE is in Kansas City Bartle Hall on March 1st and 2nd, You can get more info at [paceshow.com](http://paceshow.com).

**Reminder:** Keep your spill buckets clean and replace them if they are broken. Over 50% of all contamination at UST sites is caused by broken spill buckets

## Line Leak Detector Update

In our 3<sup>rd</sup> quarter *Advisor* we talked about KDHE requiring an annual Mechanical Line Leak Detector (MLLD) test. We have since been informed that KDHE is requiring all Line Leak Detectors, including Electronic Line Leak Detectors (ELLD), to be tested.

The ELLD will need to be function tested according to the ELLD manufacturer standards. Mike Kuel, P.B. Hoidale, states "Electronic Line Leak detector testing methods are similar to Mechanical Line Leak detection testing in that they must follow manufacturers recommendations to verify that at minimum a leak of 3 gph at 10 psi will be reported and shut down the product line. Each manufacturer does provide a testing guide for their systems." This test must be done by a KDHE licensed and insured UST technician.

(The following is repeated from the 3<sup>rd</sup> Quarter *Advisor* – just to refresh your memory on Annual Mechanical Line Leak Detector Test.)

The Kansas Department of Health and Environment recently had an EPA review of their UST program. During the review EPA found that KDHE did not conform to the rule adopted by KDHE to perform Mechanical Line Leak Detector (MLLD) test annually.

What does a MLLD do? When it detects a leak (a sudden loss of pressure) it restricts the flow to 3.0 gallons per hour commonly known as *slow flow*. It does not sound an alarm.

Beginning with your 2013/2014 permit KDHE will require all UST facilities that use MLLD's to have them tested. This test must be done by a KDHE licensed and insured UST technician. A list of approved companies may be found on the KDHE website:

[http://www.kdheks.gov/tanks/download/currently\\_licensed\\_ust\\_installers\\_removers\\_tightness\\_testers.pdf](http://www.kdheks.gov/tanks/download/currently_licensed_ust_installers_removers_tightness_testers.pdf). or you may find a link on the TMS website [tankmgmt.net](http://tankmgmt.net) under What's

If you do not know if you have MLLD on your UST lines you can find out by going to KDHE website:<http://public1.kdhe.state.ks.us/BERREGT/BERR EG.nsf/FramesetInternetPolicy?OpenFrameset> or also find this link at [tankmgmt.net](http://tankmgmt.net) under Whats New.

KDHE will still require an annual line tightness test if you are currently using it to meet KDHE line test rule.

## 2012 Tank Talks A Success!

Once again Tank Management Services (TMS) traveled across Kansas to present "Tank Talks" to AST & UST owners and operators and had great attendance at many of the talks.

In an effort to accommodate as many owners and operators as possible, each year seven to eight regional sites are chosen. This year Tank Talks were held in Topeka, Leavenworth, Independence, Newton, Beloit, Oakley, and Garden City.

Over 163 representatives of AST/UST facilities took advantage of the opportunity to gather new information on storage tanks, compliance and regulatory issues. Those attending were from trucking companies, hospitals, airports, military bases, cooperatives and convenience stores.

Don Martin, regional manager for Power Service Products, gave an informative presentation on fuel testing and additives. He was followed by Bryce Wittenborn, CEO of reNuel Fuel, who spoke on the benefits of tank cleaning.

Representatives from Kansas Department of Health and Environment (KDHE) were present at each Tank Talk to share information about compliance with EPA and KDHE rules and regulations.

David Engelken, Compliance Manager for TMS, shared the latest information on ultra low sulfur diesel (ULSD). David highlighted the corrosion issues ULSD may cause and the study on this issue by PEI, Steel Tank Institute and American Petroleum Institute.

Discussion on Level C Operator Training and resources rounded out the Tank Talks.

TMS thanks those representatives who gave of their time to speak at the Tank Talks and also those who took a half day away from their busy jobs to attend.

To have the advisor E-mailed to you go to [tankmgmt.net](http://tankmgmt.net) click on Advisor.

Tank Management Services, inc. (TMS) has provided the written information in this newsletter for educational purposes to assist UST owners and operators in complying with current UST regulations and to assist them in reducing losses associated with releases from UST's. The information is an outline and may not be complete. Owners and operators are responsible to insure that they are in compliance with all applicable laws. The Kansas Department of Health and Environment can provide detailed information on compliance. The application or use of the information provided is the responsibility of the individual user.

## Operator Training

Level A/B UST operator training for new UST owners/operators (most be trained 30 days after starting operation) and for facilities that have been cited by KDHE and ordered to be retrained, To register go to our website [tankmgmt.net](http://tankmgmt.net). Click on Operator Training.

Salina, KS	Wednesday, February 6, Salina BiCentennial Center Room 203 800 The Midway
Wichita, KS	Wednesday, March 6, Wichita State University Woodman Alumni Center Conference Room 4205 East 21st Street
Topeka, KS	Thursday, March 7, Kansas Soybean Association 1000 SW Red Oaks PL
Hays, KS	Tuesday, April 9, Fort Hays State University Memorial Union Trails Room 217 600 Park Street
Salina, KS	Wednesday, April 10, Salina BiCentennial Center Room 203 800 The Midway

**A reminder from KDHE:** All UST operators Level C personnel must be trained before they may begin working at the facility. Level C training information may be found in the manual or on the CD received by A/B operators. A Level C certificate is available at [tankmgmt.net](http://tankmgmt.net). Click on Operator Training; the link is on the left side of the page.

### WHAT IS TANK MANAGEMENT SERVICES?

TMS provides loss control and risk management assistance to UST owners who have third party liability insurance through Great American Custom as part of the Kansas Underground Storage Tank Liability Plan.

TMS can provide you with information on USTs -leak detection methods, and Federal and State regulations. Call TMS toll free at 800-530-5683 during normal Central Time Zone office hours (8-5). In the Topeka area, please call 233-1414. On the web go to [tankmgmt.net](http://tankmgmt.net). David Engelken is available to answer your questions. *This Service is free.*