

Alaska Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE

Prevention, Preparedness, and Response Program



Guidance No. PPRP 2018-01

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September 27, 2018

Supersedes Guidance No. IPP 93-03

Aboveground Storage Tanks Used During an Emergency for Temporary Storage

PURPOSE: This guidance addresses what is to be included in a plan for an aboveground oil storage tank (tank) that is designated in an oil discharge prevention and contingency plan (plan) to be used in an emergency as part of the temporary storage system for spill response or for preventing a spill from occurring.

APPLICABILITY: This guidance applies to all oil terminal, crude oil pipeline, and exploration and production facilities required under AS 46.04.030 to hold a plan.

BACKGROUND: Plan holders requested that they be able to include one or more field-constructed tanks that have been removed from service in accordance with 18 AAC 75.065(o) or shop-fabricated tanks that are no longer used for petroleum storage in their plans for emergency spill response. The tanks would serve as part of the “temporary storage system for recovered oil and oil wastes” to meet a facility’s response planning standard (RPS) as required by 18 AAC 75.445(g)(6).

On May 18, 1993, the department issued Guidance No. IPP 93-03, “Temporary and/or Emergency Aboveground Storage Tanks,” to address inspection requirements for tanks designated in plans for “temporary and/or emergency storage”. That guidance allowed plan holders to include in their plans tanks that were no longer included in a regular maintenance and inspection program for response planning purposes.

Since Guidance No. IPP 93-03 was issued, both plan holders and department staff have requested additional clarification regarding maintenance and inspection, what should be included in the plan, and a standard timeframe for use for tanks no longer included in a regular maintenance and inspection program that are designated in the plan to be used for emergency spill prevention or response.

DISCUSSION: A tank no longer listed in a plan as being used for petroleum storage is not required to be maintained or inspected under 18 AAC 75.065 or 066 or located within a secondary containment area (SCA) under 18 AAC 75.075. Some of these tanks are old and may be riveted or bolted. As a result, the integrity of the tanks is unknown or suspect. If the tanks are located in an SCA without in-service tanks, the SCAs may also not be inspected or maintained. Using a tank of unknown condition that is located in an SCA of unknown condition or outside of an SCA during a spill response is not advisable because it could result in another spill. A plan holder may not plan to use a tank of unknown condition for purposes of demonstrating their ability to respond to an RPS volume discharge. A tank used in an emergency as temporary storage for recovered oil, and/or oily water or wastes, even for a short period, must be structurally sound and, ideally, be located within an SCA that is also structurally sound.

A tank that is designated in a plan to be used in an emergency as temporary storage for spill prevention or response is considered part of the spill response equipment. 18 AAC 75.425(e)(3)(F)(vii) requires a plan to include, “the procedures for storage, maintenance, and inspection of spill response equipment under the immediate control of the operator when not in use, including procedures for periodic testing and maintenance of response equipment”. The plan must state that the tanks can hold oil, oily water, and wastes and describe the actions taken to ensure that they do not leak and are mechanically sound.

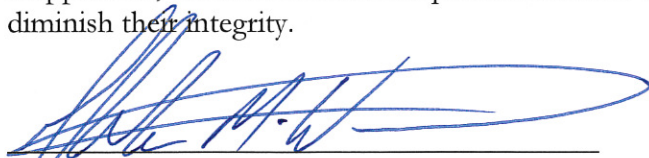
The plan must also indicate how long the tank will be used in an emergency for temporary storage. It is the plan holder’s responsibility to identify maintenance and inspection procedures, methods, and frequencies for the tank and, if applicable, the SCA. Some examples are, a “water bottom” may be maintained and monitored

when storing recovered oil to provide leak detection, or mechanical integrity may be determined by visual inspections and ultrasound thickness measurements. Department staff are responsible for assessing the reasonableness of the plan for using the tank.

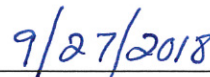
ACTION: The following requirements shall apply to a tank that is designated in a plan to be used in an emergency as temporary storage and is no longer included in the facility's regular maintenance and inspection program for in-service tanks greater than 10,000 gallons capacity:

1. The tank must be:
 - a. Disconnected from other tanks and appurtenances;
 - b. Clearly labeled with the words "OUT OF SERVICE – EMERGENCY USE ONLY" on the outer shell in contrasting lettering larger than 10 inches in height;
 - c. Used for not more than:
 - i. 60 days¹ if located in an SCA that meets the requirements under 18 AAC 75.075
 - ii. 30 days¹ if located outside of an SCA; and
 - d. Inspected and maintained on a regular basis to ensure it does not leak and is mechanically sound [18 AAC 75.425(e)(3)(F)(vii)].
2. If applicable, the SCA the tank is located in must be:
 - a. Free of debris, vegetation, excessive accumulated water, and other materials or conditions that may interfere with its effectiveness; and
 - b. Inspected and maintained on a regular basis to ensure it is structurally sound [18 AAC 75.425(e)(3)(F)(vii)].
3. The plan must:
 - a. Include the tank on the facility diagram;
 - b. Describe how the tank will be used including transfer procedures;
 - c. Describe the maintenance and inspection procedures including frequency for the tank and, if applicable, the SCA to determine the mechanical and structural integrity [18 AAC 75.425(e)(3)(F)(vii)];
 - d. Describe the procedures that will be used to restore the tank and/or SCA to a sound condition if during regular inspection and maintenance described at 1.d or 2.b above, it is discovered that the tank or, if applicable, SCA are found not to be mechanically or structurally sound;
 - e. Indicate the tank can hold oil, oily water, and wastes in the event of an emergency spill response;
 - f. Describe how the contents of the tank will be removed and disposed of; and
 - g. Indicate the maximum length of time¹ the tank will be used (this cannot be longer than the timeframes in 1.c. above).

When reviewing a plan, department staff must verify that the plan contains the information described above if a tank that is no longer included in a regular maintenance and inspection program will be used in an emergency for temporary storage. When inspecting facilities, department staff must check that the tank and, if applicable, the SCA meet the requirements listed above as well as inspect for gross defects that would diminish their integrity.



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Date

¹ During an emergency response, the State On-Scene Coordinator has the discretion to decrease or increase the amount of time that the tank can be used.