



Aboveground Storage Tank Act *Compliance Seminar*

Opening Session

Stephen Cirmaudo
Manager of Downstream Standards
American Petroleum Institute

Special thanks to our sponsors:



WEST VIRGINIA
AMERICAN WATER



What to expect when you're inspecting

Eric Miller, AC&S

Patrick Maple, Ergon

Holley Baker, Mistras

David Yaussy, Spilman Law (moderator)

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Defining Tanks

Evaluate

- Thoroughly examine each tank's role & contents

“Process Vessel” “Wastewater Treatment”
“Mobile”

← → ↻  <https://apps.dep.wv.gov/ast/astsurvey.cfm>

Do I need to register my tank?

Answer the following questions:

1. Does the structure have a storage capacity of more than 1,320 gallons?

Yes No

Defining Tanks

Organize & Prepare

- Gather important tank information & keep readily available
- Define why a tank was not registered

	G	H	I	J	K	L	M	N	O
	Tank Construction	Tank Volume GAL	Const. Date (est)	Install Date (est)	Sec. Cont. Type	Sec. Cont.	Rules	Service Status	Reasons for Not Registering
1	Single Wall; Stainless; Slab	10000	1994	Jun-95	Dike	49000	SPCC	In Service	
7	Single Wall; Stainless; Slab	10000	1994	Jun-95	Dike	49000		In Service	
8	Single Wall; Stainless; Slab	10000	1994	Jun-95	Dike	49000		In Service	
9	Single Wall; Stainless; Slab	10000	1994	Jun-95	Dike	49000		In Service	
10		520						Not Registered	Reason: This tank is below the de minimis volume of 1,320 gallons.
11		121						Not Registered	Reason: This tank is below the de minimis volume of 1,320 gallons.

Defining Tanks

Deregistration

- If you registered a tank but later determine it is not a regulated “AST”, there is a solution.

WVDEP’s Electronic Submission System

Type:

Ref. ID:

Certification

Find a certified AST inspector

- If the inspection company is outside West Virginia, you may need to educate them on the new law.
- Provide them the “Fit for Service” and “Not Fit for Service” forms.
- Get one of your employees certified
 - www.steeltank.com/educationevents

Inspections/Monitoring

What works for you?

- In your SPRP, define exactly how/when/who will monitor the AST's, ancillary equipment, and secondary equipment.
- Avoid vague statements.
 - “Our company follows SP001 for monthly AST inspections”

VS

- “Our company follows sections ... through ... of SP001. We will perform these inspections in the following manner... “

Contact Info.

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Introduction

- *Patrick Maple*, Environmental Technician at Ergon-West Virginia Inc.
- Petroleum refinery located in Newell, WV
- Products include gasoline, diesel, lube oils, waxes and resin



AST Registration

- 85 registered ASTs
 - Majority are Level 1
- Initial certification performed by private contractor
- Facility subject to SPCC, SWPPP, GPP, & EPCRA requirements



Compliance



INTERIM ANNUAL INSPECTION CERTIFICATION
Aboveground Storage Tank (AST) System
(tank, piping, dispensing systems, spill containment devices, overfill protection devices, secondary containment and release detection equipment)
Meets Requirements and is Fit for Service

AST Facility Name	Ergon - West Virginia, Inc.
Address	9995 Ohio River Blvd
City, State, Zip	Newell, WV 26050-1195
Tank Owner Name	Ergon - West Virginia, Inc.
Telephone Number	304.387.4343
Email Address	patrick.maple@ergon.com
Certifying Individual	Thomas A Gelonese
Address	4333 West 21st Street
City, State, Zip	Tulsa, OK 74107
Telephone Number	918.583.3968
Email Address	tgelonese@tank-consultants.com
Facility's/Owner's Tank ID #	TK-4012
DEP Tank Registration Number (if issued)	015-00000260

I certify under penalty of law that I have personally examined and am familiar with the inspection performed on the AST system listed above. Based on my direct knowledge and/or my inquiry of those individuals immediately responsible for obtaining the information, I believe that the AST System meets the minimum standards established by W.Va. Code 22-30 and; therefore, is fit for service. Deficiencies, if any, found during the inspection of the AST System are described in the attached document(s) along with my recommendations and a schedule for abating said deficiencies.



 Signature of Certifying Individual

 12-29-2014
 Date Signed

 API #1555
 P.E. Registration #, STI Certification # or
 API Certification #

 May 31, 2016
 Registration/Certification Expiration Date

Disclaimer: Some of the information and data reviewed was collected and processed by others. TCI accepts no liability for inaccuracies in the data or the calculations provided.

- Many tanks already subject to API & STI standards
- Monitoring performed daily during operator rounds
 - PDA tag system

WVDEP Inspection

- Registration numbers
- Signage
- Emergency contact #'s
- Secondary containment

Questions

- P.O.S. vs. Non-Op
- WWT as containment



Contact Information

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SERVICES GROUP

Approach to Compliance for Chapter 22
Article 30

The Aboveground Storage Tank Act

August 16, 2016

DELIVERING ASSET PROTECTION SOLUTIONS GLOBALLY



ONE SOURCE

PRODUCTS

PROPRIETARY PRODUCTS,
SYSTEMS & KNOWLEDGE

SOFTWARE

SYNERGISTIC PROPRIETARY
ENTERPRISE SOFTWARE

SERVICES

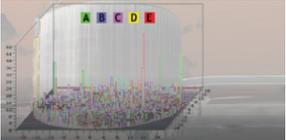
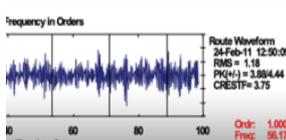
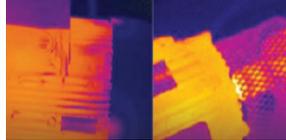
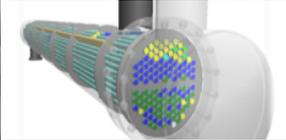
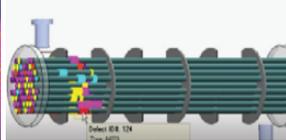
DELIVERING RUN & MAINTAIN
INSPECTION & ENGINEERING

▼ ALLOWS CUSTOMERS TO ▼

- Extend the useful life of Assets...Reliably
- Comply with Codes, Standards and Government Safety Regulations
- Outsource Inspection, Destructive Testing and Engineering Services
- Manage risk and avoid catastrophic disasters
- Reduce Outages or Turn Around Schedules
- Eliminate Unnecessary Time Scheduled Maintenance

EXPERTISE IN:

MECHANICAL INTEGRITY,
NON-DESTRUCTIVE
TESTING, DESTRUCTIVE
TESTING, AND
PROPRIETARY DATA
ANALYSIS & MGMT.
SOFTWARE...INCLUDING
RISK BASED INSPECTION

TANKS	VESSELS	PIPING	ROTATING EQUIPMENT	HEAT EXCHANGERS/ CONDENSERS
  	  	  	  	  
<ul style="list-style-type: none"> • TankPAC • Talrut • LSI 	<ul style="list-style-type: none"> • Guided Wave • Phased Array • TOFD 	<ul style="list-style-type: none"> • Touch Point Corrosion • Valve Testing & Corrosion • P-Scan & Computed RT 	<ul style="list-style-type: none"> • Vibration Analysis • Thermography • Airborne UT • Lube and Grease Analysis • Strain Gage Testing • Laser Shaft Align. 	<ul style="list-style-type: none"> • Near Field • NFT Sample Damage • Remote Field • Eddy Current • Iris Inspection • 3D Reporting

- Work with our WVMA customers to understand the intent, application, requirements and implementation of the regulation
- Maintain awareness and understanding of development and changes to the regulation in progress pertinent to facility and equipment design and application
- Work with our WVMA customers to develop and assure clearly defined applications
- Assure that applications (tanks and associated equipment within the scope of the regulation) are included in existing MI programs and that MI programs address regulatory requirements

- For most of our customers required to comply with this regulation, we either wrote, edited or implemented mechanical integrity or inspection programs and procedures that included most of the expected applications prior to the promulgation of the law
- It was our consideration to review these programs and procedures to assure the following:
 - That the programs included practices that would address the requirements of the law
 - That the programs included all applications that would now be considered by the law
 - That the schedules for execution of the practices were up to date and met the requirements of the law from a compliance timeline perspective

- Our programs generally contain an initial focus on design conditions; for most if not all the facilities at which we work, we have either acquired or developed documented design information for tanks in the programs through OEM design information or detailed inspection of as-built conditions
- As the law presents requirements for equipment, components or facilities that may not necessarily have been in our tank inspection programs (such as enclosed dikes, drainage systems, etc.), the design information for such items was either acquired, or as-built conditions were inspected and evaluated in an attempt to determine as-built design conditions.
- All of our inspection programs are based on either OEM or as-built design conditions and process considerations. These conditions form the basis for the identification of failure modes which results in the determination of best methods for inspection and monitoring practices.

- Mr. Holley Baker, General Manager - North Canton, OH lab
- Certified API 510 / 570 / 653; NDT level II
- Qualified Mechanical Integrity Professional; author of Mechanical Integrity Programs and procedures for Covestro, Axiall and ICL as well as many others

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Compliance Standards & Timelines

JB Turley, WVMA Water Team Leader, ICL

Jeffrey Knepper, GZA

John Hirschfield, Axiall

Kellie Goes, Jackson Kelly (moderator)

Special thanks to our sponsors:



WEST VIRGINIA
AMERICAN WATER



Regulator Roundtable

Ruth Porter, WV DEP

Joe Sizemore, WV DEP