

# UNDERGROUND STORAGE TANKS IN THE DISTRICT OF COLUMBIA



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July 2019

# UST BRANCH GOALS

To protect human health and the environment from the adverse effects of releases of hazardous chemicals (gasoline, heating oil, kerosene, waste oil and regulated hazardous substances) from USTs. By ensuring compliance with the DC Code and Regulations through reporting, inspections, investigations, remediation, monitoring and enforcement.

**Federal:** RCRA C 1984, UST Regulations 40 CFR 280, 1988

**DC:** Law 8-242, 1991 UST Regulations 1993: 20 DCMR Chapters 55-70 , being updated 2019.

<https://doee.dc.gov/service/underground-storage-tank-program>

# WHAT IS A UST?

An underground storage tank system includes the tank and piping of which 10% or more is buried below the ground.

USTs: can be made of metal (steel) or fiber glass reinforced plastic or both (coated) or concrete for huge field constructed tanks. Tanks can be of various capacities (gallons).

## NOT ALL USTs ARE REGULATED BY DOE:

The regulations exempt some tanks, e.g. heating oil at residences < 1,100 gallons, other tanks < 110 gallons, wastewater, oil water separators, hydraulic lifts, radioactive material UST, ASTs, etc.



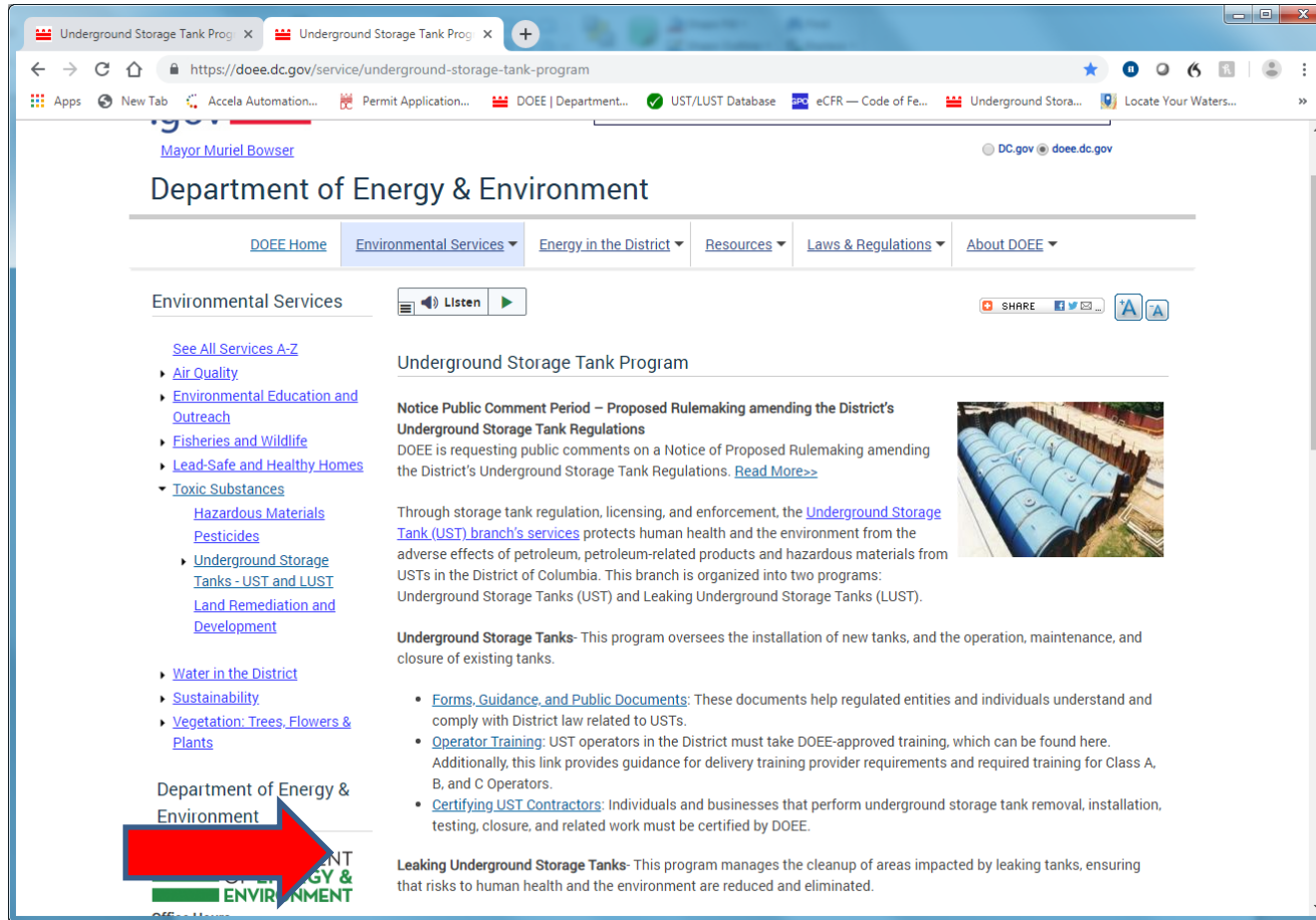


# WHAT TO DO IF YOU FIND AN UNREGISTERED UST

1. **Inform DOEE's UST Branch of the discovered tank and intention to remove the tanks and provide the address of the site the UST is located:**  
Telephone **(202) 535-2326**, or  
Email [ust.doe@dc.gov](mailto:ust.doe@dc.gov)
2. **Obtain a permit** to remove the UST at DCRA.
3. **Request UST Branch for a tank INSPECTION**, (at least one day before the tank is ready to be pulled out of the ground). Ensure the tank remover is CERTIFIED in the District to conduct the tank removal.
4. **The assigned DOEE inspector will meet TANK CONTRACTOR onsite, inspect the tank(s) and excavation, and provide a written Site Directive on sampling requirements (soil and/or groundwater samples).**
5. After inspection, **STAGE all soil and tank onsite** until the **permit** and soil sample analysis is received. The facility accepting the contaminated soil will require the soil analysis results for disposal.
6. Submit **UST Closure Assessment Report** within timeframe indicated on Site Directive which will be issued during the DOEE Site Inspection (#2)

# WHO CAN REMOVE A UST?

Answer: Only a Certified UST Contractor.



The screenshot shows a web browser window displaying the Department of Energy & Environment website. The URL is <https://doee.dc.gov/service/underground-storage-tank-program>. The page features a navigation bar with links to [DOEE Home](#), [Environmental Services](#), [Energy in the District](#), [Resources](#), [Laws & Regulations](#), and [About DOEE](#). The main content area is titled "Underground Storage Tank Program" and includes a "Notice Public Comment Period" section. A red arrow points to the "Department of Energy & Environment" logo in the bottom left corner.

Department of Energy & Environment

Environmental Services

[See All Services A-Z](#)

- [Air Quality](#)
- [Environmental Education and Outreach](#)
- [Fisheries and Wildlife](#)
- [Lead-Safe and Healthy Homes](#)
- [Toxic Substances](#)
  - [Hazardous Materials](#)
  - [Pesticides](#)
  - [Underground Storage Tanks - UST and LUST](#)
  - [Land Remediation and Development](#)
- [Water in the District](#)
- [Sustainability](#)
- [Vegetation: Trees, Flowers & Plants](#)

**Underground Storage Tank Program**

**Notice Public Comment Period – Proposed Rulemaking amending the District's Underground Storage Tank Regulations**

DOEE is requesting public comments on a Notice of Proposed Rulemaking amending the District's Underground Storage Tank Regulations. [Read More>>](#)

Through storage tank regulation, licensing, and enforcement, the [Underground Storage Tank \(UST\) branch's services](#) protects human health and the environment from the adverse effects of petroleum, petroleum-related products and hazardous materials from USTs in the District of Columbia. This branch is organized into two programs: Underground Storage Tanks (UST) and Leaking Underground Storage Tanks (LUST).

**Underground Storage Tanks**- This program oversees the installation of new tanks, and the operation, maintenance, and closure of existing tanks.

- [Forms, Guidance, and Public Documents](#): These documents help regulated entities and individuals understand and comply with District law related to USTs.
- [Operator Training](#): UST operators in the District must take DOEE-approved training, which can be found here. Additionally, this link provides guidance for delivery training provider requirements and required training for Class A, B, and C Operators.
- [Certifying UST Contractors](#): Individuals and businesses that perform underground storage tank removal, installation, testing, closure, and related work must be certified by DOEE.

**Leaking Underground Storage Tanks**- This program manages the cleanup of areas impacted by leaking tanks, ensuring that risks to human health and the environment are reduced and eliminated.

# WHAT HAPPENS NEXT?

1. The tank contractor submits the Tank Removal Report.
2. DOE inspector reviews the report.
3. If the report is completed correctly and the lab results are 'clean' (below our cleanup standards), a Tank Closure Letter is issued to the Facility Owner.
4. If the report documents lab results that are above our cleanup standards, a Leaking Underground Storage Tank (LUST) case will be opened.



# UNDERGROUND STORAGE TANK (UST) LEAKING UNDERGROUND STORAGE TANK (LUSTS)

## ACTIVITY BEING ENFORCED

**UST:** registration, installation, operation, maintenance, monitoring/testing, overfill, release prevention and detection, closure-in-place and removal ~ 500 facilities.

**LUST:** site investigations and corrective actions ~150 open cases.

## WHO IS BEING ENFORCED

- Owners and operators of USTs (e.g. gas stations, homes, schools, commercial buildings with heating oil tanks, emergency generator tanks, etc. ).
- Property owners/ responsible parties of LUST sites.

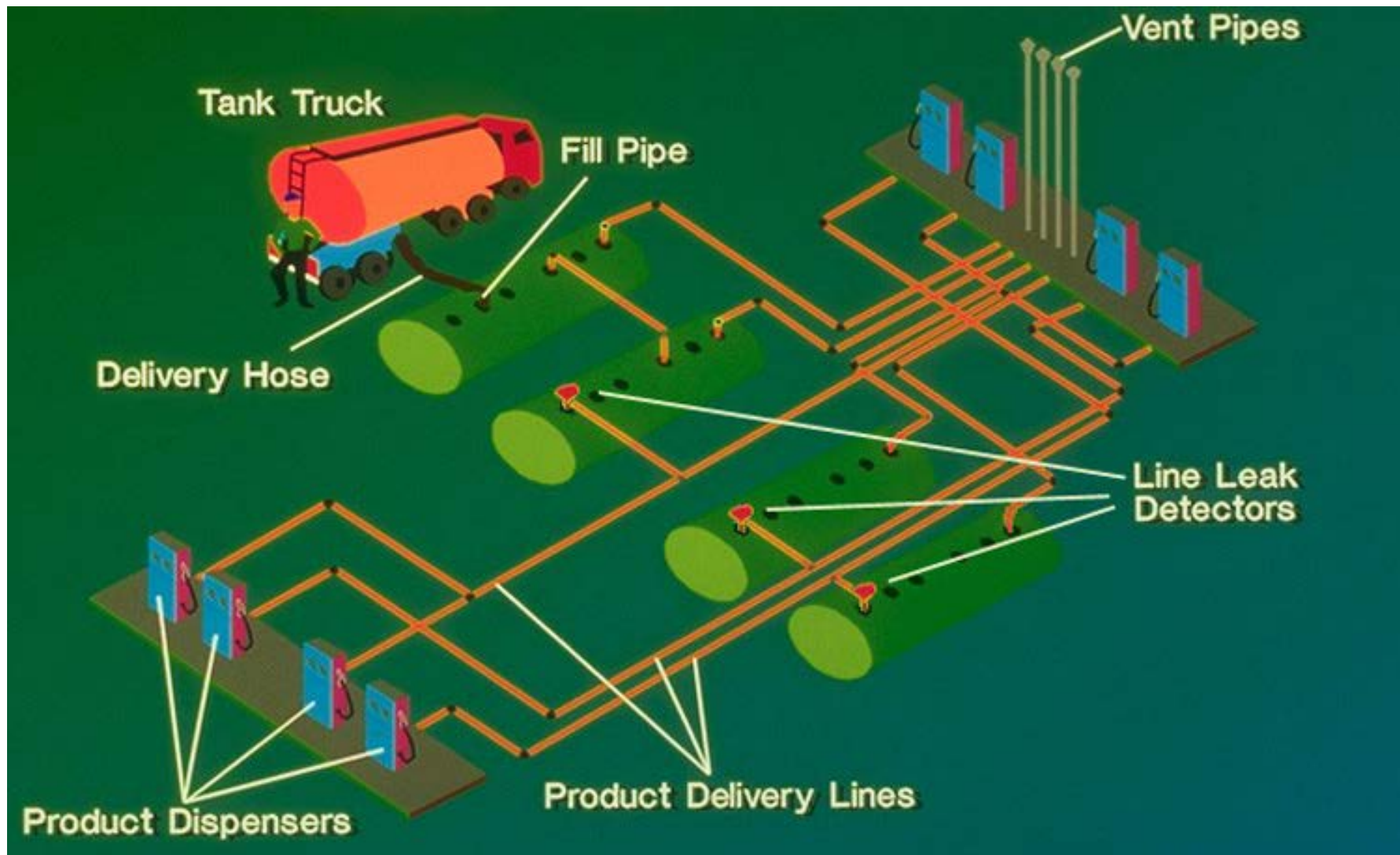
## ENFORCEMENT TOOLS USED

Directives, NOVs, NOIs, Cease Orders, Delivery Prohibition, Suspensions/Cancellation/Revocation of approvals – permits, certification, licenses,/ registration, etc.

## ENVIRONMENTAL IMPACTS:

Toxic chemicals in petroleum can impact human health & environment-contaminate soil, soil vapor, surface and groundwater and indoor air (e.g. benzene in gasoline causes cancer). Affect plants , animals, result in explosive risks, odor nuisance, lower property value, etc.

# TYPICAL FOUR-TANK STATION





# UST PROGRAM SERVICES PROVIDED

1. Register UST facilities annually/facility notifications
2. Inspect all tank related activities, installation, removal, closure-in-place, testing, repairs/upgrade, etc.
3. Inspect active tanks for operational compliance, monitoring and enforcement (SOC), e.g. gas stations, emergency generator tanks, etc.
4. Certify Contractors/UST Specialist
5. Manage UST and LUST Databases
6. Approve 3rd party UST Operator Trainer
7. Sign off on DCRA Permits for UST activities
8. Respond to complaints/emergency response
9. Respond to EISF, FOIA applications, etc.





**DOEE Inspector performing operational compliance inspection and enforcement**



# DELIVERY PROHIBITION- LOCK AND TAG FOR MAJOR UST VIOLATIONS



NPS - Brentwood Maintenance Facility, 515 New York Avenue, NE; Tagging 4K gallon diesel UST that was overfilled on Tuesday, May 10, 2016



# LEAKING UNDERGROUND STORAGE TANKS (LUST)

Any regulated **UST** which leaks petroleum or hazardous materials in to the ground (soil and/or groundwater) is called a **LUST**.





# LUST SERVICES PROVIDED

1. Inspects UST removal/closure – sampling activities
2. Develops soil, groundwater, soil gas and indoor air standards
3. Develops regulations and technical guidance, SOPs, COPs, etc.
4. Administers DC Risk Based Corrective Action (RBCA)
5. Administers the Voluntary Remediation Action Program (VRAP) – developers volunteer to cleanup LUST sites during redevelopment
6. Reviews and approves site assessment, monitoring, corrective action and case closure reports
7. Provides education and outreach
8. Responds to complaints and emergency response
9. Reviews and approves various DCRA permits - wells, soil boring installation/abandonment
10. Provides EISF Reviews for new developments
11. Responds to several FOIA requests for real estate transactions, etc.



# LUST REMEDIATION

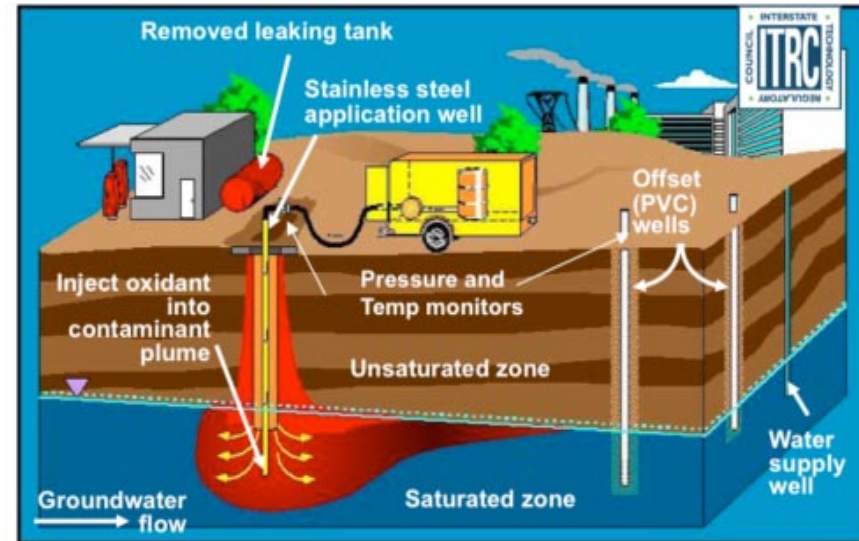
Tanks, lines, dispensers, delivery, can leak product/petroleum

Petroleum has hazardous/carcinogenic, constituents, e.g. Benzene is harmful to human health, ecology and the environment.

The soil, groundwater and indoor vapors are pathways by which humans can be affected. We do not drink groundwater in DC, if contaminated groundwater migrates from the contaminated site to offsite, those residents, workers, etc. can inhale those vapors in and be at risk.

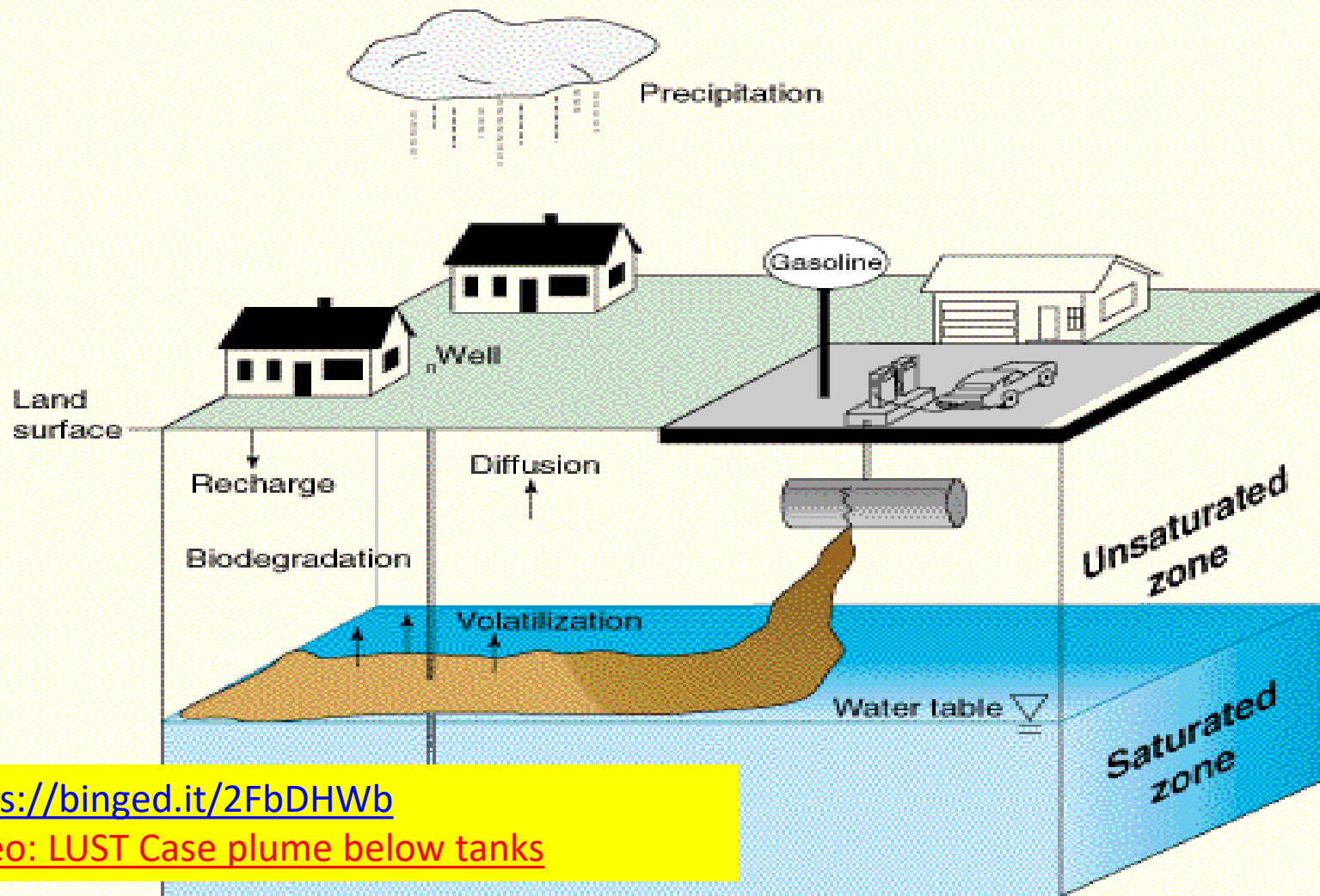
The LUST Branch ensures that any reported release is investigate and cleanup. This can sometimes take years due to the science and technology involved, various methods of remediation.

When DOEE finds that the contamination is reduced to safe levels, the case can be closed.



**In-Situ Chemical Oxidation (ISCO)**

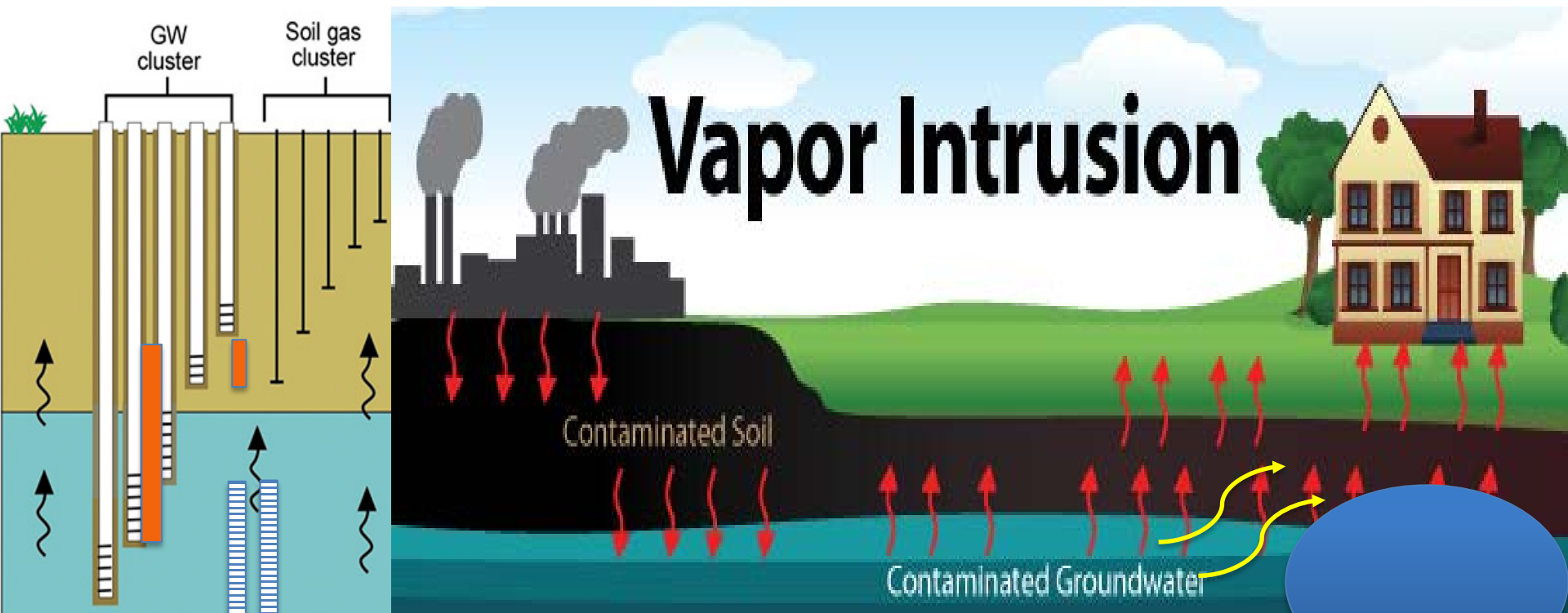
# LUST RELEASE INTO THE ENVIRONMENT



<https://binged.it/2FbDHWb>

Video: LUST Case plume below tanks

# INDOOR AIR QUALITY AT CONTAMINATED SITES





# LUST SITES REMEDIATION BEFORE AND AFTER- DC SUCCESS STORIES



View from New York Avenue NE



DOEE HQ – First & M Streets NE



# UST-LUST PROGRAMS

<https://binged.it/2F0Hy8m>

VIDEO: UST SOC Inspection Personal Safety



## WHAT WE LOOK FOR

**UST** – Safety & monitoring equipment installed and functional, product/debris in the sumps, holes, corrosion in metal tanks/lines, record keeping – registration, certification, permits, insurance, leak tests, corrosion tests, etc.

**LUST** - Evidence of stained soil in excavations, free product in the ground, sheen on water, strong gas odor, permitted wells and borings, laboratory data within standards, failure to report and cleanup spills/leaks, functional remediation system.

## HOW YOU CAN HELP

**Report** if you see something suspicious at or near your workshop, gas station, construction site or anywhere a tank is being handled. **Look for spills, stains, sheens on water, alarms that have been activated or strong gas fumes.**

# YOUR RESPONSIBILITIES TO AVOID VIOLATIONS/FINES

1. Ensure you register any regulated USTs with DOEE by November each year.
2. Have insurance for your tanks.
3. Ensure the UST system is equipped with leak detection and prevent
4. Keep relevant records for DOEE
5. Maintain Operator Certification
6. Notify DOEE within 48 hours, for a UST Branch Inspection and obtain a permit from DCRA & Fire Dept if you plan to install, remove, repair/upgrade any tank – forms online
7. Notify DOEE within 24 hours of any release from a tank, pipe, dispenser, delivery overfill and immediate begin cleanup – forms online
8. Be responsible (pay) for the cleanup of contaminated soil and groundwater – LUST Cases. Can sometimes be years or remediation and monitoring until closure.
9. Contact DOEE if unsure or to report any complains/concerns.



# UST BRANCH CONTACTS

**Fianna Phill**, Branch Chief, (202) 535-2326

**Sharon Hamilton** - (Registration/Certification) (202) 535-1950

**Donal Harden**, Administrative Assistant: (202) 299-3322

1200 First St, NE, 5<sup>th</sup> Floor ,Washington, DC 20002

Email: [ust.doe@dc.gov](mailto:ust.doe@dc.gov) Fax: (202) 535-1383

Website: <http://doee.dc.gov/service/underground-storage-tanks-ust-and-lust>

## UST PROGRAM

Wards 1 & 8:	<b>Timothy.Byrd@dc.gov</b>	(202) 481-3836 (Desk) (202) 499-0436 (Mobile)
Wards 2 & 7:	<b>Sunday.Okoro@dc.gov</b>	(202) 535-1965 (Desk) (202) 359-3710 (Mobile)
Wards 3 & 6:	<b>Vacant</b>	
Wards 4 & 5:	<b>Sylvester.Mode@dc.gov</b>	(202) 535-2529 (Desk) (202) 499-0438 (Mobile)

## LEAKING UST PROGRAM – PETROLEUM SITE REMEDIATION

Wards 1 & 8:	<b>Natalie.Hendricks@dc.gov</b>	(202) 535-1944 (Desk) (202) 281-8240 (Mobile)
Wards 2 & 7:	<b>Deepak.Singh@dc.gov</b>	(202) 535-2634 (Desk) (202) 281-0870 (Mobile)
Wards 3 & 6:	<b>Vacant</b>	
Wards 4 & 5:	<b>Nazmul.Haque@dc.gov</b>	(202) 535-1330 (Desk) (202) 499-0438 (Mobile)





# THANK YOU FROM DOEE'S UST BRANCH!