

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Environmental Cleanup and Brownfields

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TITLE: Storage Tank Cleaning Activities

EFFECTIVE DATE: September 8, 2012

AUTHORITY: Storage Tank and Spill Prevention Act of 1989 (P.L. 169)

POLICY: It is the policy of the Department of Environmental Protection (Department or DEP) to carry out the provisions of the Storage Tank and Spill Prevention Act of 1989 and related regulations.

PURPOSE: This guidance establishes when a certified individual is required for oversight of storage tanks cleaning activities, and highlights the specifications and regulations which may have an effect on these activities.

APPLICABILITY: This guidance is applicable to companies and individuals who are involved in tank cleaning activities.

DISCLAIMER: The policies and procedures outlined in this guidance are intended to supplement existing requirements. Nothing in the policies or procedures shall affect regulatory requirements.

The policies and procedures herein are not an adjudication or a regulation. There is no intent on the part of DEP to give the rules in these policies that weight or deference. This document establishes the framework within which DEP will exercise its administrative discretion in the future. DEP reserves the discretion to deviate from this policy statement if circumstances warrant.

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STORAGE TANK CLEANING ACTIVITIES

Onsite tank cleaning for removal from service of underground storage tanks (USTs) requires the direct onsite supervision and control of an installer certified for removal of an UST. The installer must perform or provide direct onsite supervision of the tank handling activities associated with the removal from service and remain onsite to verify the cleaning activities. Written confirmation of the tank cleaning must be provided for the tank closure report.

Onsite tank cleaning for removal from service of aboveground storage tanks (ASTs) requires the involvement of an installer certified for removal of an AST. The installer must perform or provide direct onsite supervision of the tank handling activities associated with the removal from service and verify the cleaning. However, the installer is not required to remain onsite during the cleaning activities. Written confirmation of the tank cleaning should be provided to the tank owner.

Routine AST/UST cleaning for change of stored product, routine maintenance or preparation for tank modifications does not require the onsite involvement of a certified tank installer when “tank handling activities” do not take place. When tank handling activities are involved such as: groundbreaking, inerting, cutting or removal of the tank, modification or removal of the tank components (such as piping, pump units or monitoring equipment) or any activity other than unbolting manways and blanking off valves or piping, a certified tank installer for the appropriate category must be present and directly involved with the tank handling or modification activities. The certified tank installer need not remain on site during the actual cleaning portion of the activity.

Particular care must be exercised to assure safe handling and proper disposal of volatile and toxic substances resulting from cleaning activities. No one should enter the storage tank without first having the required confined space entry training and appropriate protective equipment. The certified individual, the individual responsible for oversight of the cleaning activity and/or the individual actually doing the cleaning, should be familiar and comply with or conform to the applicable parts of the latest revisions of the following specifications and regulations:

- EPA 40 CFR Part 280, Subpart G, “Out of Service UST Systems and Closure,”
 Section 280.71 (B) & (C).
- NFPA 30 Appendix C.
- NFPA 327 (Cleaning or Safeguarding Small Tanks and Containers Without Entry) 1993 Edition.
- Pa Pennsylvania State Police Fire Marshal Flammable and Combustible Liquids Handbook,
 Subchapter C, Sections 13.222 through 13.226.
- Pa Technical Document--Closure Requirements for Underground Storage Tank Systems,
 Dec. 1993, Sections I, II, III, IV parts A and B, V part A, VI parts A and B.

American Petroleum Institute Publication (API) 2015. (Safe Entry and Cleaning of Petroleum Storage Tanks), Entire Document.

American Petroleum Institute Publication (API) 1604. (Removal and Disposal of Used Underground Petroleum Storage Tanks, Sections 1, 3 and 4.

Tank cleaning involves removal of product and/or sludge, applying a wash or chemical cleaning agent to the internal or external surface of aboveground or underground tanks and preparing tank surfaces by wiping, scraping, sanding or other methods.

The technical staff has visited a substantial number of AST facilities to inquire on and observe tank entry procedures and observe tank cleaning practices. These visits have reinforced the need for certified installers' presence during tank handling activities while supporting the position that cleaning of ASTs is generally a lengthy project that does not require direct supervision by a certified installer. Additionally, the number of AST installers available presently is not adequate to provide for continuous onsite supervision of tank cleaning.