

IMPLEMENTATION PLAN TO STREAMLINE PERMITTING OF NEW UST SYSTEMS

August 26, 2013

Since 2007, underground storage tank owners installing or replacing UST systems are required to have DWM approval before operating permits can be issued. These requirements were promulgated to ensure correct installation of UST systems and to reduce the possibility of leakage. Some UST owners have complained that the approval process is unduly "information heavy" and that the issuance of the operating permits is taking more time than necessary, with both situations impeding the opening of convenience stores/gasoline stations. The UST program within the Division of Waste Management (DWM) has met on several occasions with UST owners, representatives of the NC Petroleum and Convenience Marketers, and UST system installers. As a result of the information shared in those meetings, DWM refined the process of permitting new and replacement UST installations. The refined process focuses on further eliminating redundant information requests, eliminating "bottlenecks" in the process by gathering crucial information earlier, and issuing temporary operating permits as soon as the UST systems owners demonstrate they have met criteria specific to beginning safe operations. DWM and the members of the UST community agreed that these refinements will allow new and replacement UST systems to begin full operations sooner.

Changes Made to Streamline Process

To reduce the review time and streamline this process, DWM will implement the following modifications to the permitting process:

- Combine pre- and post-installation applications, reorganize and eliminate non-critical information.
- Gather and review tank fees, financial responsibility, ownership information and certain test results (e.g., overfill operability, spill bucket) earlier.
- Issue temporary operating permits when final testing results and sensor set-up/printouts are submitted and approved.
- Reduce the review time for post-installation applications with no major modifications from 10 to 5 business days.

Overview of New Process

A step-wise summary of the new process is provided below. Please note that all necessary forms can be found on the UST Section website <http://portal.ncdenr.org/web/wm/ust/ustmain>

Pre-Installation Phase:

STEP 1: Submit UST-6 (Pre-Installation) application to NCDENR - UST Section for review and approval.

STEP 2: Upon receipt of UST-6 (Pre-Installation) application proposing the installation of new USTs, an invoice for tank fees will be issued by the UST Section. (Applicable tank fees for petroleum USTs must be paid before NCDENR will authorize the placement of regulated product into USTs including a one-time fuel drop authorization.)

STEP 3: Upon review and approval of the UST-6 (Pre-Installation) application, an installation approval letter will be issued by the UST Section.

Installation Phase:

[Note: steps may vary depending on UST system components that will be installed]

STEP 4: Contact UST Inspector to request a tank installation inspection.

STEP 5: Submit a copy of the tank manufacturer's installation checklist to the UST Section documenting the UST installation date(s).

STEP 6: Contact UST Inspector to request a piping installation inspection.

STEP 7: If product is required for UST system testing (post-installation), contact UST inspector to request a one-time fuel drop authorization.

Post-Installation Phase:

STEP 8: Submit UST-6 (Post-Installation) application to the UST Section for review and approval.

STEP 9: Upon review and approval of the UST-6 (Post-Installation) application, a standard UST operating permit will be issued. If the UST-6 (Post-installation) application is not fully complete, but contains the final testing results and other information critical to beginning safe operation, then a temporary operating permit will be issued for a period of about 60 days during which the applicant must file a complete application.

Table 1 summarizes the installation phases and the forms and other information required to be submitted for review for each phase.

Implementation Timeline

The UST Section will begin implementation of the new process on August 26, 2013. The new UST-6 (Pre-installation) form may be used immediately for new installations. The old UST-6A (Pre-installation) form will be accepted until October 26, 2013 after which all new pre-installation applications must be submitted on the new UST-6 (Pre-installation) form. Installations that already have approved UST-6A applications and that are in the construction phase, may submit the old UST-6B (Post-installation) forms at the post-installation application phase. However, the new process including issuance of temporary operating permits will be applied to these locations as much as possible.

Table 1 – Application Submittal/Review Process

Pre-Installation	One-Time Fuel Drop Authorization	Post Installation - Temporary Operating Permit	Post-Installation - Standard Operating Permit
UST-6 (Pre-installation) Application – Basic Information (e.g., owner, operator, location, engineer, contractor, Tank ID, equipment)	Must Pass Installation Inspections – Including physical inspection of containment sumps (generally, must be full of water during piping inspection)	UST-6 (Post-installation) Application – Any changes or modifications. Contractor certification.	UST-6 (Post-installation) Application -Tank owner certification. Tank UL listing and serial numbers. Any changes or modifications.
Ownership Documentation	UST-22A – Overfill Prevention Verification and Operability Check (submitted to inspector for review)	UST-6E/23D – Tank Interstice Testing	As-Built Plans (only submitted if there were modifications to the original design plans.)
Engineer Design Plans	UST-6D/23A - Spill Bucket Testing for primary & interstitial (submitted to inspector for review)	UST-6G/23C – Pipe Testing (including line tightness tests and automatic line leak detector tests)	UST-6C Schedule of Materials UST-6C (only submitted if there were modifications to the original design plans.)
UST-6C Schedule of Materials		Leak Detection Monitoring Sensors (including sensor set-up, sensor status & sensor functionality tests and UST 22B form)	UST 6F/23B – Containment Sump Testing and UST 22C form, Containment Sump Visual Inspection
Payment of Operating fees – You will be invoiced after we receive your UST-6 (Pre-Installation) Application. These fees should be paid as soon as possible, but must be submitted prior to one-time fuel drop (for final testing) authorization			Tank & Piping Installation Checklists
Financial Responsibility - May be submitted at this time, but must be submitted prior to temporary operating permit authorization			
Installer Certifications - May be submitted at this time, but certifications and any updates to certifications must be submitted prior to standard operating permit authorization			