



Syracuse University Environmental Health and Safety Services

Guidance Document for the Closure of Petroleum Bulk Storage Tanks

This guidance document provides a general summary of the requirements for the closure of petroleum bulk storage tanks at Syracuse University.

Prior to Tank Closure

- 1) Environmental Health and Safety Services (EHSS) must be notified prior to any proposed or planned closure of an underground storage tank (UST) or above ground storage tank (AST) system.
- 2) The University's Fire and Life Safety Services (FLSS) must also be notified to assess whether the closure activities comply with University policies and applicable building and fire codes.
 - a) A hot work permit must be obtained from FLSS if any spark or flame producing equipment is to be used.
- 3) EHSS must provide at least 30 days advance notice to the New York State Department of Environmental Conservation (NYSDEC) regarding the closure of any tank at a regulated facility.
 - a) If the tank is to be closed within the City of Syracuse, city code requires that the closure be performed by a contractor that has a valid flammable and combustible liquid mechanical license issued by the city (also known as a "tank & pipe license").
 - b) The licensed tank contractor must submit a permit application to the City's Division of Code Enforcement and file a notice to the Syracuse Fire Department's Fire Prevention Bureau.
 - c) The proposed tank closure cannot proceed until the permit application has been approved via the issuance of a permit from the Division of Code Enforcement and copies of the following documents have been submitted to EHSS: a copy of the tank contractor's tank & pipe license, a copy of the permit, and copies of all of the permit application documents.

Tank Closure Requirements

- 4) To permanently close a UST or AST system, all liquids and accumulated sludge must be removed from the system.
 - a) For USTs, the tank must be removed from the ground or filled in place with an inert solid material (such as sand or concrete slurry). All connecting and fill lines must be disconnected and removed or securely capped or plugged and all manways must be securely fastened in place.
 - b) For ASTs, if the tank is permanently closed but not removed, it must be stenciled with the date of permanent closure and must be protected from flotation. Any AST that is permanently closed but not removed, may not return to service unless the entire AST system meets the requirements for Category 3 AST systems.
- 5) EHSS is responsible for facilitating the disposal of all wastes generated during the tank closure process. Tanks that are permanently closed and removed must be cleaned and disposed of at an EHSS-approved scrap metal recycling facility. A tank cleaning certificate and proof of disposal for the tank must be provided to EHSS for recordkeeping.
- 6) If a tank is closed at a regulated facility, EHSS must submit an application to amend the facility's tank registration to NYSDEC within 30 days following the permanent closure of the tank. Records of the permanent closure must be maintained at the facility for a period of three years.

- 7) For UST systems that are subject to state & federal regulations, an assessment must be performed of the excavation zone during the permanent closure of the UST. The excavation zone assessment must measure for the presence of a release where contamination is most likely to be present around the UST system. EHSS is responsible for performing or providing direction regarding the excavation zone assessment and is also responsible for submitting the required summary report to NYSDEC within 90 days after the permanent closure of the UST.

Discovery of Contamination

- 8) If visual or olfactory signs of leaking or contamination are observed at any time during the tank closure process, all work must stop and EHSS must be notified immediately.
- a) If contamination is observed in the soil or subbase materials, EHSS will make the required regulatory notification to NYSDEC within two hours of the discovery of contamination.
 - b) EHSS will provide oversight and direction regarding the excavation, segregation/staging (on polyethylene sheeting), and sampling of the impacted materials.
 - c) All contaminated materials must remain onsite until proper waste disposal is coordinated by EHSS. Uncontaminated soil and subbase materials may be reused onsite, transported offsite for reuse at other University owned properties, or disposed of at a NYSDEC Registered C&D Processing Facility.
 - d) EHSS will perform or provide oversight/direction regarding the collection of any closure samples required by NYSDEC.
 - e) After the cleanup is complete, EHSS will draft and submit a closure report to NYSDEC requesting regulatory closure for the spill associated with the discovery of contamination.