



# Syracuse University Environmental Health and Safety Services

## Guidance Document for Temporary and Portable Petroleum Bulk Storage Tanks

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

### Temporary vs Portable

- 1) A **temporary tank** is a stationary aboveground storage tank (AST) that is installed (rendered immobile) and intended for use on a property for no more than 180 consecutive days during any 12-month period. A temporary tank is not regulated by NYSDEC unless the tank remains at a facility for more than 180 days after installation.
  - a) An example of a temporary tank is an AST that is brought onsite and connected via piping to an emergency generator to provide fuel for the generator on a temporary basis, while the NYSDEC-registered tank that normally provides fuel for the generator is out of service.
- 2) A **portable tank** is a non-stationary (i.e. mobile) AST. Portable tanks are not regulated by NYSDEC unless the tank is rendered immobile (i.e., becomes stationary) by being permanently affixed to or installed at one location through such actions as being connected via permanent hard piping or being installed on a stationary foundation/base.
  - a) Examples of portable tanks include skid mounted ASTs, truck bed fuel transfer tanks, fuel tanks on portable equipment such as electrical generators, light towers, water pumps, etc.

### Notification Requirements

- 3) Environmental Health and Safety Services (EHSS) must be notified prior to the planned procurement, installation, or use of any **temporary tanks** or **portable tanks** on University property.
  - a) If a temporary tank is not removed from a facility within 180 days after installation, it must be registered with NYSDEC and comply with NYSDEC's Petroleum Bulk Storage (PBS) regulations.
  - b) If a portable tank is rendered immobile and not removed from a facility with 180 days after installation, it must be registered with NYSDEC and comply with NYSDEC's PBS regulations.
  - c) EHSS is responsible for facilitating the registration process and will provide guidance regarding the applicable PBS compliance requirements.
- 4) The University's Fire and Life Safety Services must also be notified of all temporary tanks and portable tanks to assess whether the construction and proposed location of the tank comply with University policies and applicable building and fire codes.

### Compliance Requirements - Spill Prevention, Control, and Countermeasure (SPCC)

- 5) All tanks, including **temporary tanks** and **portable tanks**, with a capacity  $\geq$  55 gallons must meet the requirements of the EPA's SPCC Rule and any requirements specified in the facility's SPCC Plan.

General requirements for tanks that are subject to the SPCC Rule:

- a) Tank must have appropriate secondary containment capable of holding 110% of the capacity of the tank.
  - b) Tank must be periodically inspected.
  - c) Tank must be added to the facility's SPCC Plan within six months of the tank being onsite (if applicable).
- 6) EHSS will provide guidance to SU Facilities personnel and contractors regarding compliance requirements such as secondary containment, spill & overfill prevention equipment, labeling, and if necessary will facilitate the amendment of the facility's SPCC Plan.