Revisions to Vermont AST Rules

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Rule Revision Efforts to Date

- DEC started working on revisions in 2022
- Worked collaboratively with VFDA throughout process
  - Draft Rules and checklists submitted for VFDA review and comment in Feb. and Oct. 2023
  - Revisions made based on VFDA responses

- DEC presentation on rule revision at Basin Harbor VFDA meeting in June 2023

DEC Review of Rules

- Storage Tanks Staff
- Hazardous Waste Staff
- Sites Management Staff
- Spill Response Program Staff
- Legal Team
- Enforcement Team

Rulemaking Process

- DEC/ANR leadership approval - Complete
- ICAR - Approved on Feb. 23, 2024
- Draft Rules to be filed w/ SOS by March 11
  - Public comment period will open on March 11 and run for 45 days
  - Public hearing will be on April 16th Dill Building Conference Room, Berlin – 6 pm)

Rulemaking (con't)

- Final Proposed Rules will be filed with SOS after public hearing; all received comments will be addressed
- Goals for key dates:
  - LCAR meeting - end of May
  - Final Rules filed with SOS - June 2024
  - Final Rules in effect - July 1, 2024
- Tentative Training on new Rules:
  - June 2024 at VFDA meeting
  - Fall 2024

Important Distinction: "Existing" vs. "New"

In the revised AST Rules, revised AST Checklists, and this presentation:

- **NEW** tank system/installation = installed *after* effective date of revised Rules (tentative July 1, 2024)
- **EXISTING** tank system/installation = installed *before* revised Rules go into effect

Most Significant Rule Revisions

- Additional requirements for NEW systems
- Phased-in requirements for EXISTING systems
- New Red Tag Items
- New “Yellow Tag” Provision - **Major Revision**

ALSO:

- Revisions and updates to Inspection Checklists
- Development of new checklist for “New Tank Systems” (installed after Rules go into effect)

Most Significant Rule Revisions

- Inspection intervals- changing from 3 year to 4 year

- Document retention- must retain inspection sheets for **4 years** to match inspection interval (you should have at least 1 inspection record on file per each tank you fill!)

“Less Significant” Rule Revisions

- New Definitions
- Technical corrections, clarifications of requirements
- Reorganization of installation/inspection standards

Changes to Installation Standards

- Rules clearly differentiate between those standards applicable to:
  - **ALL TANKS** (Existing *and* New), and
  - **NEW TANKS** (only)
- **ALL TANKS**:
  - Fill and Vent Pipes must be made of metallic materials
  - PVC piping is prohibited

Additional Standards for NEW Tanks

- Fill and Vent Pipes: must be constructed in compliance with NFPA Part 31, Sec 8.2.1.1 (Sched 40 steel or brass)
- Piping and Fuel Lines: any piping in contact with earthen material or concrete must be coated or sleeved to prevent crushing and corrosion
- Tanks Located in Flood Prone Areas: tank anchoring standards (not new standard, but will be enforced for new installs)

ASTs in Flood Prone Areas

- July 2023 -

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Phased-in Standards for Existing Tanks (by July 1, 2030)

- Tank Foundations must be concrete, 4 inches deep, with a footprint that exceeds by 10% (carry over from 2017 Rules)
- Fill and Vent Pipes must be constructed in compliance with NFPA Part 31, Sec 8.2.1.1 (Sched 40 steel or brass)
- Piping and Fuel Lines in contact with earthen materials and/or concrete must be coated and sleeved to prevent corrosion and crushing
- Tank Legs must be 14 inches or less in length (unless written exemption given by Agency)
- Outdoor ASTs must be protected from ice/snow damage
- Tanks Located in Flood Prone areas - anchor standards

Releases from ASTs, 2012-2022

Incident Type	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
AST leak or failure	80	60	49	39	44	37	27	36	36	33	31
AST line (piping), fitting or filter	23	21	30	29	23	21	24	21	21	19	22
AST leak due to ice or snow	NA	3	2	1	3	3	5	4	4	8	1
Corrosion of fuel lines from concrete	12	15	8	18	9	11	6	8	9	13	12
Total Related Incidents	115	99	89	87	79	72	62	69	70	73	66
Total Spills for Year	633	591	633	667	570	679	563	581	581	548	530

Existing vs. New Install Red Tag List

REQUIREMENT	EXISITING	NEW
Stable Foundation	x	x
Continous Concrete Foundation		x
Fill and Vent Lines Minimum Diameter	x	x
Fill and Vent Lines Metallic Materials	x	x
Fill and Vent Lines Sched 40 steel or brass		x
Piping and Fuel Lines - Corrosion Protection	x	x
Piping and Fuel Lines - Crushing Protection		x
Overfill Vent Alarm	x	x
Shut-off Valve		x
Tank Legs Max Length		x
Rust on Tank and Legs, Pitting, Bulging, etc.	x	x
Unused Openings Closed/Plugged	x	x
Fuel Gauge Device		x
Outdoor ASTs- protection from ice/snow damage		x
For Manifolded Tanks- each tank is compliant	x	x
AST in Flood Prone Area- tank anchoring		x

Existing vs. New Install Red Tag List

REQUIREMENT	EXISITING	NEW
Stable Foundation	x	x
Continous Concrete Foundation		x
Fill and Vent Lines Minimum Diameter	x	x
Fill and Vent Lines Metallic Materials	x	x
Fill and Vent Lines Sched 40 steel or brass		x
Piping and Fuel Lines - Corrosion Protection	x	x
Piping and Fuel Lines - Crushing Protection		x
Overfill Vent Alarm	x	x
Shut-off Valve		x
Tank Legs Max Length		x
Rust on Tank and Legs, Pitting, Bulging, etc.	x	x
Unused Openings Closed/Plugged	x	x
Fuel Gauge Device		x
Outdoor ASTs- protection from ice/snow damage		x
For Manifolded Tanks- each tank is compliant	x	x
AST in Flood Prone Area- tank anchoring		x

Changes to Inspection Standards for EXISTING Tanks

- New **Red Tag** items:
  - All unused ports must be closed/plugged
  - Fill and Vent pipe must be made of metallic material (no PVC piping allowed)

- New **Yellow Tag** provision (more on this later)

Routine/New Customer for EXISTING Tanks

Aboveground Storage Tank (AST) Routine/New Customer Inspection Checklist

VERMONT
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FOR TANKS INSTALLED BEFORE JULY 1, 2024

Approved for use by the Agency of Natural Resources on xx/xx/2024

Aboveground storage tank (AST) inspections are required by the Aboveground Storage Tank Rules, (effective XX/XX/2023). Tank inspections are required to be conducted in accordance with Section 9-305 of the Rules. This checklist is to be completed by the person inspecting the tank.

Inspection Completed by:_____Company:_____

Tank Owner Info:

Name:	Address:
City/Town:	Phone/email:

Type of Inspection: Routine (once every three years) ☐ New Customer ☐
Tank Location: Indoor ☐ Outdoor ☐ **Is tank located in a flood prone area?** ☐ YES ☐ NO
Year of Tank Installation _____ check here if install year unknown ☐
Number of tanks in tank system One ☐ Two or more ☐ (If 2+, each tank must be compliant with questions below)

Tank Compliance Items (NA = Not Applicable)	YES COMPLIANT	NO RED	NO YELLOW
Is the tank on a stable foundation? *(i.e., the tank is freestanding, no evidence of leaning or tilting, no evidence of subsidence)* (1)	☐	☐	NA
Are buried fuel line(s) and buried tank piping coated or sleeved to protect against corrosion? Check here to indicate fuel lines and piping are NOT buried ☐	☐	☐	☐
Is the tank equipped with a functional overfill vent alarm/whistle? Is the vent pipe within 12 feet of the fill pipe and visible from the fill pipe? (3) For Indoor Tank	☐	☐	NA
For Outdoor Tank	☐	☐	☐
Is the fill and vent pipe diameter a minimum 1 ¼ inches and made of metal? (NOTE: For manifolded tank systems, each tank must either have a separate fill and vent pipe or have a separate fill but manifolded vent pipe to be compliant.) (4)	☐	☐	☐
Are all unused tank openings plugged/closed?	☐	☐	NA
Is tank free of the following deficiencies? (If NO, then check all items that apply) (5) Dents or bulges visible in tank ☐ Moderate pitting on tank ☐ Moderate rust on legs ☐ Moderate rust on tank ☐ Visible evidence of leak at the fill or vent pipe (top of tank) ☐ For double walled tanks, the interstitial space leak indicator showing presence of leak ☐	☐	☐	☐
Is tank free of the following deficiencies? (If NO, then check all items that apply) (5) Cracks in tank legs or tank ☐ Excessive rust on tank surface or tank legs ☐ Excessive Pitting on tank ☐ Tank is actively leaking, dripping or weeping ☐	☐	☐	NA

STOP: If ANY answers to above questions are "NO" and "RED tag" the inspector shall affix a **"Do Not Fill"** (RED) tag to the tank. If ANY answers to above questions are "NO" and only "YELLOW tag" is indicated, the inspector may affix a "**Conditional Fill**" (YELLOW) tag to the tank. Applying a YELLOW tag to a tank where any of the above inspection items have a RED tag selection is **PROHIBITED.**

(turn over for certification statement)

Additional Inspection Items- Must be brought to Compliance by July 1, 2030	YES	NO
Is the tank installed on a concrete pad at least 4 inches thick and a footprint exceeding dimensions of tank by at least 10%?	☐	☐
Are any piping or fuel lines in direct contact with earthen materials or concrete? If yes, are the piping and lines coated and sleeved to protect from corrosion and damage? (2)	☐	☐
Is the fill piping made of schedule 40 steel or brass and according to NFPA? Are fill and vent pipes fitted with appropriate caps?	☐	☐
For **outdoor** tanks only: Is tank protected from hazards (falling ice and snow from roof)? (6) *Leave response blank for indoor tanks*	☐	☐
Are all tank legs no longer than 14 inches in length? (8)	☐	☐
For tanks located in flood prone areas: Is the tank anchored to concrete pad or alternative preapproved foundation and is the vent pipe of sufficient length to extend above projected flood level? *Check NA to confirm tank is not located in flood prone area* NA ☐	☐	☐
Other tank system notes:		

*The number at the end of each question refers to the tank diagram on page 3 of this form

ALL inspections resulting in a RED tag or YELLOW tag must be reported to the Agency within 5 days using the following link: https://anrweb.vt.gov/DEC/ERT/Non_Compliant_AST.aspx

CERTIFICATION STATEMENT

I, _____ as the inspector of this AST do certify that the
(Print name and company)

tank installed at _____
(Property address)

was inspected on _____.
(Date)

Check one:

☐ This tank system was found to be compliant with AST Rules.
☐ This tank system is noncompliant with AST Rules and has been Red Tagged.
☐ This tank system is noncompliant with AST Rules and has been Yellow Tagged; photo documentation has been collected of noncompliant items and has been filed with the inspection checklist.

_____ _____
(Signature of certified tank inspector) (Date)

RECOMMENDED REPAIRS/ UPGRADES

Repair or replace foundation ☐
Replace unprotected oil lines with sleeved and coated oil lines ☐
Install alarm and/or move vent pipe to approved location ☐
Other Recommendations: _____
Replace fill and/or vent line(s) ☐
Replace tank or tank legs ☐
Anchor tank to concrete ☐

The tank inspector is required to provide a copy of the completed checklist to the tank owner within five business days of the date of inspection. A copy of the completed checklist and any photo documentation shall also be retained by the tank inspector for three years and shall be provided to the Agency of Natural Resources upon request.

Changes to New Installation/First FILL Checklist

- NEW INSTALLATIONS *must* be installed in compliance with *all* installation standards provided in AST Rules
- If a tank is *not* installed in compliance with *all* standards = **RED TAG / DO NOT FILL TANK**
- Inspection checklist modified to reflect this (example to follow)

New Installation/First FILL Checklist

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Aboveground Storage Tank (AST)
New Tank System Installation/First Fill Inspection Checklist
Approved for use by the Agency of Natural Resources on 7/x/2024

Aboveground storage tank (AST) inspections are required by the Aboveground Storage Tank Rules (effective XX/XX/2024). Tank inspections are required to be conducted in accordance with Section 9-305 of the Rules. This checklist is to be completed by the person inspecting the tank.

Inspection Completed by:_____ Company:_____

Tank Owner Info:

Name:	**Address:**
City/Town:	**Phone/email:**

Type of Tank 12 GA Steel Single Wall ☐ 12 GA Steel Double Wall ☐
Fiberglass Single Wall ☐ Fiberglass Double Wall ☐
Double-wall tanks with Polyethylene or other plastic polymer inner wall and metallic outer wall ☐
Other Type:_____

Tank Location: ☐ **Indoor** ☐ **Outdoor** **Is tank located in a flood prone area?** ☐**YES** ☐ **NO**

Date of Tank Install: _____(Date of Installation Must be Visibly Identified on Tank)

If tank replacement, was the existing tank taken out of service and removed? ☐**YES** ☐ **NO**

COMPLETE AFTER TANK INSTALLATION BUT BEFORE FIRST FILL: (The number at the end of each question refers to the tank diagram on page 3 of this checklist)	**NA**	**YES**	**NO**
Is the tank installed on a concrete pad at least 4 inches thick and a footprint exceeding dimensions of tank by at least 10%? **(1)** *Check NA only if an alternative foundation has been approved by the Agency in writing. Provide Date of Approval*_____	☐	☐	☐
Are piping and fuel lines that are in direct contact with earthen materials or concrete, coated and sleeved to protect against corrosion and damage? **(2)** *Check NA only if pipes and fuel lines are not in direct contact with earthen material or concrete.*	☐	☐	☐
Is the vent line equipped with an overfill vent alarm that is within 12 feet of the fill pipe and visible from the fill pipe? **(3)**		☐	☐
Is the fill and vent line diameter a minimum 1¼ inches and is the fill piping made of metal materials permitted by NFPA 31? Are fill and vent pipes fitted with appropriate caps? **(4)**		☐	☐
Is the entirety of tank surface and legs free of any cracks, significant corrosion, pitting, rust, spores, dents, and bulges? **(5)**		☐	☐
Does the tank have a shut-off valve within 12 inches of the AST fuel outlet? OR If tank draws fuel from the top of tank, is the shutoff valve installed before the fuel filter? **(9)**		☐	☐
Are all unused openings plugged/closed?		☐	☐
Are all tank legs no longer than 14 inches in length? **(8)** *Check NA only if longer legs were approved by the Agency in writing. Provide Date of Approval*_____	☐	☐	☐
Does the tank have an operational fuel level gauge? **(7)**		☐	☐

Continue on Page 2

	NA	**YES**	**NO**
For tanks with Double Wall Protection: is the tank equipped with a functional interstitial leak detector? (*Leave response blank if single wall tank*)		☐	☐
For outdoor tanks: is the tank protected from hazards (falling ice and snow from roof)? **(6)** *Leave response blank for indoor tank.*		☐	☐
For indoor tanks- is tank located on the lowest floor of the structure? *Check N/A if an alternative location has been approved by Agency in writing; leave response blank for outdoor tank. Provide Date of Agency Approval*_____	☐	☐	☐
If there are multiple tanks, does each tank either have a separate fill and vent pipe or have a separate fill but manifolded vent pipe? *Check NA only if does not apply.*	☐	☐	☐
For tanks located in flood prone areas: is the tank anchored to concrete pad or alternative preapproved foundation and is the vent pipe of sufficient length to extend above projected flood level? *Check NA only if tank is NOT located in a flood prone area OR if you received written exemption from this requirement form the Secretary.*	☐	☐	☐

STOP! If any responses to the above questions are "NO", the tank has not been installed in compliance with the Vermont AST Rules and cannot be filled. Unless the out-of-compliance issues can be addressed immediately, the tank must be Red Tagged.

COMPLETE AFTER FIRST FILL FOR NEW INSTALLATIONS ONLY:	**YES**	**NO**
Is the system free of drips, leaks, or other evidence of a release?	☐	☐
Did the vent alarm function during the delivery?	☐	☐

If any responses to the above questions are "NO", the tank has not been installed in compliance with the Vermont AST Rules and must be Red Tagged unless the out-of-compliance issues can be addressed immediately.

CERTIFICATION STATEMENT

I, _____, as the inspector of
(Print name and company)

this AST do certify that the new installation located at _____
(Property address)

was inspected on: _____ and was found to be ☐ In Compliance with standards specified in 2024 VT AST rules.
(Date) ☐ Not in Compliance

_____ _____
(Signature of certified tank inspector) (Date)

The tank inspector is required to provide a copy of this completed checklist to the tank owner within five business days of the date of inspection. A copy of the completed checklist shall also be retained by the tank inspector for three years and shall be presented to the Agency of Natural Resources upon request.

Version 1, 7/1/24

New Checklist

- Eventually, new installations will need routine/new customer inspections - new checklist developed for this.
- Routine inspections for NEW systems will be more stringent than for EXISTING systems.
- If NEW tanks installed correctly in the first place and not modified by homeowner, only non-compliance in future will be tank rust/degradation.

Routine/New Customer for NEW Systems

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Aboveground Storage Tank (AST)
Routine/New Customer Inspection Checklist
FOR TANKS INSTALLED AFTER JULY 1, 2024
Approved for use by the Agency of Natural Resources on 7/1/2024

Aboveground storage tank (AST) inspections are required by the Aboveground Storage Tank Rules (effective XXXXXX). Tank inspections are required to be conducted in accordance with Section 9-305 of the Rules. This checklist is to be completed by the person inspecting the tank.

Inspection Completed by:_____Company:_____

Tank Owner Info:

Name:	**Address:**
City/Town:	**Phone/email:**

Type of Inspection: Routine (once every three years) ☐ New Customer ☐
Tank Location: Indoor ☐ Outdoor ☐ **Is tank located in flood prone area?** ☐ YES ☐ NO

Date of Tank Install: _____(Date of Installation Must be Visibly Identified on Tank)

Tank Compliance Items	NA	YES	NO
Is the tank installed on a concrete pad at least 4 inches thick and a footprint exceeding dimensions of tank by at least 10%? **(1)** *Check NA only if an alternative foundation has been approved by the Agency in writing. Provide Date of Approval* _____	☐	☐	☐
Are piping and fuel lines that are in direct contact with earthen materials or concrete, coated and sleeved to protect against corrosion and damage? **(2)** *Check NA only if pipes and fuel lines are not in direct contact with earthen material or concrete.*	☐	☐	☐
Is the vent line equipped with an overfill vent alarm that is within 12 feet of the fill pipe and visible from the fill pipe? **(3)**		☐	☐
Is the fill and vent line diameter a minimum 1¼ inches and is the fill piping made of metal materials permitted by NFPA 31? Are fill and vent pipes fitted with appropriate caps? **(4)**		☐	☐
Is the entirety of tank surface and legs free of any cracks, significant corrosion, pitting, rust, spores, dents and bulges? Is tank and all tank fittings lacking evidence of leaks, drips, or other signs of a actual or suspected release? **(5)**		☐	☐
Does the tank have a shut-off valve within 12 inches of the AST fuel outlet? OR If tank draws fuel from the top of tank, is the shutoff valve installed before the fuel filter? **(9)**		☐	☐
Are all unused openings plugged/closed?		☐	☐
Are all tank legs no longer than 14 inches in length? **(8)** *Check NA only if longer legs were approved by the Agency in writing. Provide Date of Approval* _____	☐	☐	☐
For tanks with Double Wall Protection: does the interstitial leak detector indicate tank is not leaking?	☐	☐	☐
Does the tank have an operational fuel level gauge? **(7)**		☐	☐
For **outdoor** tanks only: is the tank protected from hazards (falling ice and snow from roof)? **(6)**		☐	☐

Tank Compliance Items	NA	YES	NO
For **indoor** tanks only: is tank located on the lowest floor of the structure? *Check NA only if an alternative location has been approved by Agency in writing. Provide Date of Approval* _____	☐	☐	☐
If there are multiple tanks, does each tank either have a separate fill and vent pipe or have a separate fill but manifolded vent pipe? *Check NA only if single tank.*	☐	☐	☐
For tanks located in flood prone areas only: is the tank anchored to concrete pad or alternative preapproved foundation and is the vent pipe of sufficient length to extend above projected flood level? *Check NA only if you received written exemption from this requirement form the Secretary.*	☐	☐	☐

The number at the end of each question refers to the tank diagram on page 3 of this form.

STOP! If any responses to the above questions are "NO", the tank is not in compliance with the Vermont AST Rules and must be Red Tagged.

ALL inspections resulting in a RED tag must be reported to the Agency within 5 days using the following link: https://anrweb.vt.gov/DEC/ERT/Non_Compliant_AST.aspx

CERTIFICATION STATEMENT

I, _____, as the inspector of
(Print name and company)

this AST do certify that the tank located at _____
(Property address)

was inspected on: _____ and was found to be ☐ In Compliance ☐ Not in Compliance with standards specified in 2024 VT AST rules.
(Date)

_____ _____
(Signature of certified tank inspector) (Date)

The tank inspector is required to provide a copy of this completed checklist to the tank owner **within five business days** of the date of inspection. A copy of the completed checklist shall also be retained by the tank inspector for three years and shall be presented to the Agency of Natural Resources upon request.

Version 1, 7/1/24

Version 1, 7/1/24

Final Word on Checklists

- Required to provide checklist to customer within 5 days (changing from 2 days)
- All Red Tags *and* Yellow Tags must be reported to Red Tag database within 5 days (database will be updated accordingly)
- Must **certify** that tank is compliant or that you red/yellow tagged it

Yellow Tags for Non-Compliance

Why Yellow Tag?

- Some tanks are noncompliant but have lower risk of release
- It takes time to replace/repair tanks, but people need heat
- Red Tags can leave customers without heat in winter
- Yellow Tags allow for a more balanced approach (risk of releases vs. people freezing in their homes)

Yellow Tag vs. Conditional Permission to fill Red Tagged Tank

- ANR Conditional Permission = OLD practice (will sunset)
- Yellow Tag = NEW practice
- Conditional permission to fill Red Tagged tanks will STOP being granted after new rules go into effect. Yellow Tagging replaces this practice.
- No more allowances to fill tanks lacking a stable foundation
  - make sure all your customers have tanks on stable foundation
  - this requirement in effect since 2017 so all tanks must be either compliant or red tagged.

How Does a Yellow Tag Work?

- Applicable to **EXISTING SYSTEMS only**
- Applicable to **RESIDENTIAL ASTs only**
- ANR defines the non-compliance items which can be Yellow Tagged and those that cannot (more on next slide)
- Yellow Tags issued by tank inspector based on professional judgement at time of tank inspection; you **do not** need ANR approval to issue Yellow Tag
- Yellow Tags **may** (not must) be used in lieu of Red Tags. Each fuel company can decide to be more conservative and only Red Tag for non-compliance

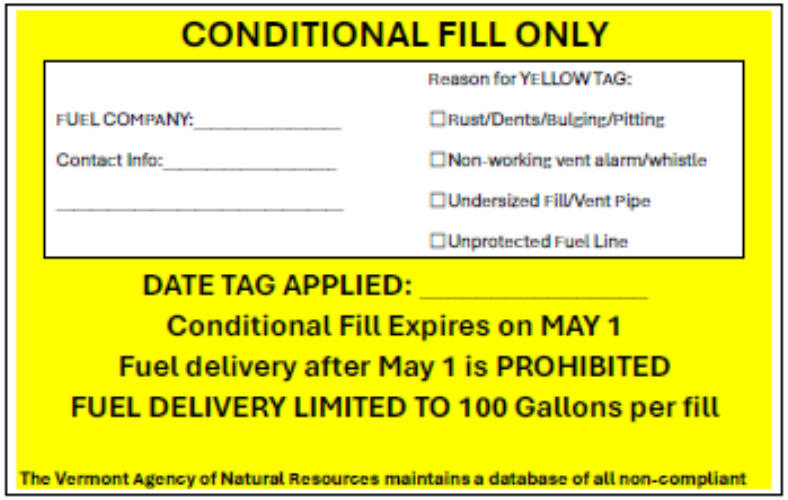
What is Yellow Taggable?

- Yellow Tag can be used **ONLY** for the following:
  - Lack of overfill alarm (outdoor tanks)
  - Buried fuel lines not coated/sleeved to prevent corrosion
  - Fill and vent line diameter and material not compliant
  - Moderate rust on tank or tank legs (NO active leaking must be observed) – most subjective item
- Yellow Tag **NOT applicable**: unstable foundation; lack of overfill alarm (indoor tanks); presence of unused ports that are not plugged; and excessive rust/pitting, cracks in legs, and observed leaking/dripping.

More on Yellow Tag Use

- Must be documented and reported to ANR just like a Red Tag; also requires photo documentation of non-compliance that results in Yellow Tag (retain but do not submit photos to ANR)
- Physical YELLOW (“CONDITIONAL FILL”) tag must be attached to tank and fill port (just like a red tag)
- CONDITIONAL FILL - limited to 100 gallons per delivery at reduced fill rate
- ALL Yellow Tags issued during the heating season **expire on May 1.** Expired Yellow Tag = RED TAG
- Cannot be renewed. Must replace/repair tank continue receiving fuel

Red and Yellow Tags



New Definitions in AST Rules

- AST is now Aboveground Storage Tank **System**
- “SKID TANK” - rules define what does and does not qualify as AST
- “EXISTING TANK” means tank installed **before** revisions
- “NEW TANK” means tank installed **after** revisions
- “RED TAG”- added formal definition
- “YELLOW TAG” - added formal definition
- “RESIDENTIAL” definition
- Bulk Storage Facility and Bulk Storage Tank - revised

Additional Clarifications

- AST design standards and inspections **DO NOT** apply to Bulk Storage Tanks/Facilities; those are subject to federal SPCC Rules
- AST inspection standards **DO NOT** apply to ASTs storing used oil
- Skid Tanks that are mobile or semi-mobile **ARE NOT** ASTs and not subject to Rules

Status of Current Red Tags

- There are currently 1,855 red-tagged tanks in Database

Since 2017 = 83	Since 2021 = 216
Since 2018 = 151	Since 2022 = 321
Since 2019 = 229	Since 2023 = 319
Since 2020 = 494	Since 2024 = 42

Please contact us to remove tanks that no longer need to be on red tag list!

Data compiled 2/12/2024

Questions?

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