



On September 15, 2010, Virginia's Underground Storage Tank (UST) Technical Regulation (§9VAC25-580 et seq.) (Virginia's Regulation) was amended to include operator training requirements. Section 25-580-125 of Virginia's Regulation requires UST owners and operators to identify and train certain classes of UST operators in critical tank operational compliance activities. Each designated UST Operator must complete the required training **by August 8, 2012** and must repeat the training if areas of UST noncompliance are identified by DEQ and not resolved in a timely manner.

Since the State of Tennessee offers free on-line UST Operator training and Virginia allows reciprocity, many Virginia UST Operators may opt to complete the Tennessee Tank Helper on-line courses and tests to meet Virginia's UST Operating Training requirements. Training certificates issued from Tennessee Tank Helper will be honored by Virginia DEQ via reciprocity. However, Virginia UST operators need to be aware that there are differences between Virginia and Tennessee UST requirements. This document is a training supplement to Tennessee Tank Helper and discusses the differences between Tennessee's and Virginia's UST requirements and should be used by Virginia UST operators as a training supplement to Tennessee Tank Helper. The Virginia Regulation should also be consulted and is available on-line at www.deq.virginia.gov/tanks/.

This document does not establish or affect legal rights or obligations, does not establish a binding norm, and is not determinative of the issues addressed. Decisions in individual cases will be made by applying the laws, regulations, and policies of the Commonwealth to case-specific-facts.

TIPS FOR VIRGINIA OPERATORS USING TENNESSEE TANK HELPER

1. Virginia Operators need to register for the Tennessee Tank Helper as "Class A or B Operators".
2. All modules under the designated operator class should be completed in Tennessee Tank Helper.
3. The Training Certificate should only be printed after all Class B modules are completed. This will ensure that the Class B Operator(s) has only one certificate for the entire Class B training.

VIRGINIA'S UST REGULATION VS. TENNESSEE'S UST REGULATION

Following are discussions of the differences between Virginia's UST Regulation and Tennessee's UST Regulation as found in the Tennessee Tank Helper modules. This compilation of differences does not change or affect Virginia's policies, procedures, guidance, and is not all inclusive.

CLASS A OPERATOR MODULE

Page 3

Virginia requires a Class C operator to be briefed on the emergency response and notification procedures every 12 months.

Page 5

Virginia's civil penalties for UST violations differ from Tennessee's penalties.

Pages 6, 7, and 8

Virginia's Delivery Prohibition Process is different than Tennessee's Red Tag Policy. Additional information regarding Virginia's Delivery Prohibition Process may be found on DEQ's Petroleum Programs website located at www.deq.virginia.gov/tanks/.

Page 9

Virginia's Regulation requires a building permit be obtained from the local officials prior to installing USTs or associated equipment. DEQ Form 7530-2 "Notification for Underground Storage Tanks Form" must be filed with the appropriate DEQ Regional Office within **30 days of UST installation**. It is highly recommended that DEQ's petroleum storage tank staff be consulted 30 days prior to a UST installation.

Page 10

Virginia does not have notification fees for USTs.

Page 11

DEQ Form 7530-2 "Notification for Underground Storage Tanks Form" must be completed and submitted to DEQ within 30 days for the following:

1. Change in ownership
2. Tank status (temporarily/permanently closed out)
3. Tank/piping upgrades (addition of corrosion protection or internal lining)
4. Change of release detection system
5. Change of stored substance

Page 12

Virginia's new secondary containment requirements were effective September 15, 2010.

Page 17

Spill prevention devices must be kept free of debris, water, or product, but monthly inspections are not required by Virginia's Regulation.

Pages 19, 20, 21, and 22

Virginia's new secondary containment and interstitial monitoring requirements were effective September 15, 2010.

All regulated UST systems are required to have leak detection, except emergency generator tanks installed prior to September 15, 2010.

If under-dispenser containment is required at a facility, interstitial monitoring (visual or electronic) must be conducted at least every 30 days.

Page 30

A suspected or confirmed release must be reported to Virginia DEQ within **24 hours** of discovery.

Page 33

Virginia's Regulation does not require recordkeeping for spill prevention device checks.

Page 37

Financial Responsibility demonstration amounts are based upon the annual throughput of petroleum through all regulated USTs owned and/or operated in the Commonwealth of Virginia. The specific financial responsibility requirements are illustrated in the table below.

UST Financial Responsibility Requirements			
ANNUAL THROUGHPUT (gallons)	Corrective Action (per occurrence)	Third Party Liability (per occurrence)	Annual Aggregate
600,000 or less	\$5,000	\$15,000	\$20,000
600,001-1.2 million	\$10,000	\$30,000	\$40,000
1,200,001-1.8 million	\$20,000	\$60,000	\$80,000
1,800,001-2.4 million	\$30,000	\$120,000	\$150,000
Over 2.4 million	\$50,000	\$150,000	\$200,000

CLASS B OPERATOR MODULES

<i>General Module</i>

Pages 2-4

Virginia Class B Operators should ensure that the Class C Operators they are responsible for are appropriately trained. Class C Operators may be trained by the certified Class A and/or Class B Operator, a third party, or by taking the Class C module in Tennessee Tank Helper.

Page 5

Virginia requires a Class C operator to be briefed on the emergency response and notification procedures every 12 months.

Page 8

Virginia's civil penalties for UST violations differ from Tennessee's penalties.

Pages 9-13

Virginia's Delivery Prohibition Process is different than Tennessee's Red Tag Policy. Additional information regarding Virginia's Delivery Prohibition Process may be found on DEQ's Petroleum Programs website located at www.deq.virginia.gov/tanks/.

Page 15

Virginia's new secondary containment and interstitial monitoring requirements were effective September 15, 2010.

Page 22

All new pressurized piping installed after September 15, 2010 must be double-walled or secondarily contained, and use interstitial monitoring for release detection. Additional guidance regarding Virginia's secondary containment requirements may be found on DEQ's Petroleum Storage Tank website located at www.deq.virginia.gov/tanks/.

Page 31

Virginia's new secondary containment and interstitial monitoring requirements were effective September 15, 2010.

Page 32

Virginia's Regulation requires a building permit be obtained from the local officials prior to installing USTs or associated equipment. DEQ Form 7530-2 "Notification for Underground Storage Tanks Form" must be filed with the appropriate DEQ Regional Office within **30 days of UST installation**. It is highly recommended that DEQ's petroleum storage tank staff be consulted 30 days prior to a UST installation.

Page 33

Virginia DEQ does not have any notification/registration fees for USTs.

Page 34

Virginia's new secondary containment and interstitial monitoring requirements were effective September 15, 2010.

Page 36

If under-dispenser containment is required at a facility, interstitial monitoring (visual or electronic) must be conducted at least every 30 days.

Page 38

Additional guidance regarding Virginia's secondary containment requirements may be found on DEQ's Petroleum Storage Tank website located at www.deq.virginia.gov/tanks/.

Page 40

Corrosion protection systems may be repaired if the system fails and the tank/piping is suitable for upgrade.

Page 42

The regional DEQ office should be contacted for guidance if you have bare steel tanks and/or piping.

Page 43

All regulated tanks are required to have leak detection except emergency generator tanks installed prior to September 15, 2010.

Page 44

Piping associated with an emergency generator tank is not required to have leak detection if it was installed before September 15, 2010.

New pressurized piping installed after September 15, 2010 must be double-walled or have secondary containment and use interstitial monitoring for release detection.

Existing pressurized piping (>50%) replaced after September 15, 2010 must be double-walled or have secondary containment and use interstitial monitoring for release detection.

Page 45

Virginia requires dispenser covers to be opened and visually inspected or electronically monitored for petroleum at least every 30 days if the required under-dispenser containment system was installed after September 15, 2010. Additional guidance regarding Virginia's secondary containment requirements may be found on DEQ's Petroleum Storage Tank website located at www.deq.virginia.gov/tanks/.

Virginia's Regulation does not require monthly spill catchment basin inspections. However, Virginia does require replacement of damaged basins in most cases. Additionally, the basins should be kept free of water, dirt, debris, and/or other substances that could interfere with the ability of the basins to prevent releases of product to the environment.

Page 47

A suspected or confirmed release must be reported to the DEQ within **24 hours** of discovery.

Page 48

Class C Operators may be trained by the certified Class A and/or Class B Operator, a third party, or by taking the Class C module in Tennessee Tank Helper.

Page 49

A suspected or confirmed release must be reported to the DEQ within **24 hours of** discovery.

Page 52

Spill prevention device logs are not required by Virginia's Regulation.

Virginia requires dispenser covers to be opened and visually inspected or electronically monitored for petroleum at least every 30 days if the required under-dispenser containment system was installed after September 15, 2010. Additional guidance regarding Virginia's secondary containment requirements may be found on DEQ's Petroleum Storage Tank website located at www.deq.virginia.gov/tanks/.

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All written performance claims about the leak detection system and any schedules of required calibration and maintenance must be kept for 5 years from the date of installation or as long as the method of release detection is used, whichever is greater.

Spill and Overfill Prevention ModulePages 3-4

Spill prevention devices must be kept free of debris, water, or product but monthly inspections are not required by Virginia's Regulation.

Page 14

Virginia's rule may be found at 9VAC25-580-80 and is very similar to Tennessee's rule except that Virginia's rule includes petroleum and hazardous substances.

Tank and Piping Release Detection ModuleWhat You Must Know About Leak Detection

All regulated UST systems are required to have leak detection, except emergency generator tanks installed prior to September 15, 2010.

Virginia's new secondary containment and interstitial monitoring requirements were effective September 15, 2010.

Tank Leak Detection Methods that are Allowed in Tennessee

Virginia Regulation allows Inventory Control and Tank Tightness Testing as a leak detection method for USTs less than 10 years old or USTs that were upgraded less than 10 years ago. Additional information regarding Inventory Control and Tank Tightness may be found in the EPA Handout "Doing Inventory Control Right". The handout may be obtained at www.epa.gov/oust/pubs/index.htm.

Interstitial Monitoring Using Secondary Containment

Although rarely used, an excavation liner and internal tank bladder are allowed as secondary containment in Virginia as long as they are compatible with the product stored.

Sensors should be checked periodically to make sure they are working properly in accordance with manufacturer's instructions.

Sump sensors or visual monitoring may be used to meet the requirements for piping and under-dispenser containment interstitial monitoring. Monitoring of under-dispenser containment systems is not required unless the system was installed after September 15, 2010.

Virginia's new secondary containment and interstitial monitoring requirements were effective September 15, 2010.

Virginia requires dispenser covers to be opened and visually inspected for petroleum at least every 30 days if the required under-dispenser containment system was installed after September 15, 2010.

Additional guidance regarding Virginia's secondary containment requirements may be found on DEQ's Petroleum Storage Tank website located at www.deq.virginia.gov/tanks/.

Manual Tank Gauging and Manual Tank Gauging with Tank Tightness Testing

Suspected releases must be reported within **24 hours** of discovery.

Statistical Inventory Reconciliation (SIR)

Suspected releases must be reported within **24 hours** of discovery.

Pressurized Piping

Virginia's new secondary containment and interstitial monitoring requirements were effective September 15, 2010. Additional guidance regarding Virginia's secondary containment requirements may be found on DEQ's Petroleum Storage Tank website located at www.deq.virginia.gov/tanks/.

Piping Leak Detection

Piping associated with an emergency generator tank is not required to have leak detection (provided it was installed before September 15, 2010).

New pressurized piping installed after September 15, 2010 must be double-walled or have secondary containment and use interstitial monitoring.

Corrosion Protection for Tanks and Piping Module

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The regional DEQ office should be contacted for guidance if you have bare steel tanks and/or piping.

IF YOU HAVE QUESTIONS REGARDING VIRGINIA'S UST REQUIREMENTS, VIRGINIA DEQ PHONE NUMBERS ARE LISTED BELOW

Alicia Meadows (540) 562-6853
UST Operator Training Coordinator

Russ Ellison (804) 698-4269
UST/AST Program Coordinator

Regional Offices:

Tidewater Region (Virginia Beach)	(757) 518-2000
Northern Region (Woodbridge)	(703) 583-3800
Piedmont Region (Richmond)	(804) 527-5020
Valley Region (Harrisonburg)	(540) 574-7800
Blue Ridge Region (Roanoke)	(540) 562-6700
Blue Ridge Region (Lynchburg)	(434) 582-5120
Southwest Region (Abingdon)	(276) 676-4800