



ADMINISTRATIVE DIRECTIVE

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I. PURPOSE

This Directive establishes the policy and departments' roles and responsibilities for the acquisition, operation, maintenance, repair, and removal of aboveground and underground storage tanks containing gasoline, E85, diesel, bio-diesel, oil, transmission fluid, antifreeze, or any other flammable, combustible or regulated liquid.

II. POLICY

All aboveground and underground storage tanks owned by the City of Tucson will comply with all applicable local, state and federal laws and regulations. The City, whenever practicable, will install above ground storage tanks, piping, and dispensing equipment in lieu of underground storage tank systems for fueling applications.

III. DEFINITIONS

- A. **Storage Tank System** – An underground or aboveground storage tank and all physically connected piping and equipment, including dispensers, vent lines, and refill couplings/connections.
- B. **Aboveground Storage Tank (AST)** – Any storage system used to store or catch fueling operations liquids in which less than ten percent (10%) of the storage volume of the system (including piping) is underground.
- C. **Underground Storage Tank (UST)** – Any storage system used to store or catch fueling operations liquids in which ten percent (10%) or more of the storage volume of the system (including piping) is underground.
- D. **Fuel System** – Includes the fuel storage tank and any associated leak detection monitoring apparatus, piping, valves, connections and dispensers.
- E. **Leak Detection** – The process of regularly monitoring a tank's contents and/or its surrounding environment for leakage of contents.
- F. **Tightness Test** – A test to precisely determine the amount of content leakage or leakage rate from a storage tank.
- G. **CERCLA** – Comprehensive Environmental Response, Compensation, and Liability Act of 1980. A United States federal law designed to clean up releases



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or threatened releases of hazardous substances that may endanger public health or the environment.

- H. **RCRA** – Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste.
- I. **Environmental Due Diligence** – The process of performing environmental investigations on real property. These investigations are based on the most current versions of American Society for Testing and Materials (ASTM) Standards E1527 and E1903, and are performed to establish potential environmental liability due to possible presence or impacts of regulated/hazardous substances and/or petroleum hydrocarbon compounds.

IV. **RESPONSIBILITIES**

Responsibilities associated with storage tank systems are described by department as follows:

A. **The Fire Prevention Section of the Tucson Fire Department (TFD) shall:**

1. Ensure compliance of all storage tanks with applicable codes and regulations by overseeing and monitoring compliance and providing technical assistance.
2. Identify tanks which require manual leak detection monitoring (inventory control), and specify the types and frequencies of monitoring necessary to meet code and regulatory requirements.
3. Order and coordinate the closure of any tank(s) suspected of leaking until inspections/tests can be performed to verify actual situation.
4. Generate and maintain written records documenting all permits relating to the installation, removal, repair, maintenance, and modification of City ASTs/USTs, retain copies of all notifications to state or federal agencies concerning City USTs, to satisfy recordkeeping requirements.
5. Maintain the list of City ASTs/USTs approved and legal for use.



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B. The Planning and Development Services Department (PDSD) shall:

In conjunction with the Tucson Fire Department Fire Prevention Section, review plans and issue permits for the installation of new storage tanks and for modifications to existing ASTs/USTs.

C. The Environmental Services Department (ES) shall:

1. Manage, on behalf of the user departments, all necessary regulatory closures of fuel systems and remediation projects associated with releases or impacts to the environment from AST/UST systems. These actions shall follow all applicable federal (CERCLA, RCRA), state and local regulations.
2. Serve as the City's liaison with regulatory agencies during investigation and remediation.
3. Provide technical assistance regarding AST/UST regulatory and code compliance.
4. Manage, on behalf of the user departments, all necessary City Environmental Due Diligence assessments of USTs/ASTs on real property associated with any transfer of ownership.
5. Request assessment services, as may be necessary, pertaining to suspected leaks, spills, or releases from storage tanks.
6. Request regulatory closures from state and local agencies when storage tanks are taken out of service or removed. Obtain closure documents from necessary agencies.
7. Provide budgetary estimates/updates annually to the Office of Budget and Internal Audit for storage tank remediation projects.



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D. The Architecture and Engineering Division (AE) of the General Services Department (GSD) shall:

1. Manage, on the behalf of the user departments, all new construction, modifications, repairs, removals, and replacements of all City fuel island ASTs/USTs and associated equipment.
2. Provide consultation and review of all preliminary designs, plans and specifications directly involving or impacting the City's fuel island AST/UST automated leak detection and inventory monitoring systems.
3. Ensure all necessary tank facility construction permits are obtained from the Planning and Development Services Department and the Tucson Fire Department.

E. The Facilities and Communications Maintenance Division (FCM) of the General Services Department (GSD) shall:

1. Coordinate, in conjunction with the Fleet Services Division (Fleet) and AE, long-term planning to upgrade, modify or replace aging equipment and storage tank systems.
2. Coordinate leak detection and tank testing as required by codes and regulations.
3. Maintain and repair all City ASTs/USTs and associated equipment including automated leak detection, automated inventory monitoring, and dispenser and control systems or fuel management systems as directed by Fleet or the Transportation Department's Transit Services Division (Sun Tran and Sun Van).
4. Ensure Fleet and Transit Services have access to the fuel storage tank monitoring system for delivery and inventory reports.
5. Receive electronic tank monitoring status reports and investigate and resolve problems.
6. Review daily status reports and notify Fleet, Transit Services and Fire Prevention of any unresolved problems.



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7. Respond to emergency call-outs coming from the general dispatch operator (Control A-4144) of the Communications Section of the Tucson Fire Department, and if the alarm is valid (represents a fuel loss), call 9-1-1 for the dispatch of the Tucson Fire Department to the tank site. Contact Environmental Management Program (EMP) Coordinator (837-3710 or 403-0295) to notify about the possibility of potential spills or releases. Provide timely updates to Fleet.
8. Administer the contract for UST tank and line tightness testing and provide reported results to Fire Prevention, Fleet and Transit Services.
9. Perform inspections of ASTs and provide results to Fire Prevention, Fleet and Transit Services.
10. Order contracted pumping services for emptying of any and all emergency catchment and containment structures.
11. Promptly notify Environmental Services EMP Coordinator, Fleet, and Transit Services when permit(s) for tank removal are granted by PDSD and the Tucson Fire Department.
12. Provide written records to Fire Prevention documenting all installations, repairs, maintenance, modifications and removals of automated leak detection and inventory monitoring systems to satisfy recordkeeping requirements.
13. Assist in the inspection of construction directly involving or impacting the City's AST/UST automated leak detection and inventory monitoring systems, and provide consultation to the relevant parties concerning the results of its inspection(s).
14. Report to Tucson Fire, EMP Coordinator and Fleet any spills resulting from the overfilling of a storage vessel regardless of the quantity (Tucson Fire personnel will determine and direct the measures necessary to remedy the spills).



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F. The Fleet Services Division (Fleet) of the General Services Department (GSD) shall:

1. Operate the City's fuels storage and dispensing facilities, with the exception of Sun Tran and Sun Van.
2. Plan for and fund the operation and maintenance of fuel and associated product tanks.
3. Order all products dispensed from City ASTs/USTs (except for Sun Tran and Sun Van).
4. Electronically monitor tank levels on a daily basis.
5. Monitor and record (in respect to all the tanks it operates) product levels with a dipstick or tank gauge not less than once per week, compare the results to those of the electronic fuel monitoring system, and report all discrepancies to FCM.
6. Maintain written records of inventory control activity.
7. Maintain written records documenting manual inventory control measurements, calculations, and results on each tank for the life of the tank plus three years after its closure.
8. Manage ADEQ UST Exemption Certificates for all City fuel tanks and process the Annual Activity Tax Report for USTs.
9. Investigate and report immediately upon discovery suspected leaks, including those from dispensers, to FCM, Fire Prevention (791-4014) and Environmental Services EMP Coordinator (791-3175 or 403-0295).
10. Issue and maintain fuel dispensing cards/fobs for user access.



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G. The Communications Section of the Tucson Fire Department shall:

1. Receive messages and alarms from automated leak detection systems and notify FM-Service@tucsonaz.gov or call 791-3141 during normal business hours (8:00 AM to 5:00 PM Monday through Friday excluding holidays), and notify the on-call FCM representative of any and all alarms after hours.
2. For after-hour leaks, contact Marshall 31 designee and EMP Coordinator (403-0295).

H. The Fleet Services Division and Transit Services Division shall:

1. Notify 9-1-1 immediately of any suspected or real leaks, including those from dispensers. Subsequently notify the EMP Coordinator (791-3175 or 403-0295).
2. Report to the Fire Prevention and the Environmental Services EMP Coordinator any spills resulting from the overfilling of a storage vessel regardless of the quantity. Tucson Fire and the EMP Coordinator will determine and direct the measures necessary to remediate the spills.
3. Request ongoing maintenance and repair services from FCM. Phone in work order requests to 791-3141 or e-mail "FM-Service" during normal working hours and 791-4144 during off-hours.
4. Inform FCM, Fire Prevention and Environmental Services-EMP Coordinator of all significant changes in operating uses, products and volumes of ASTs/USTs.

I. The Real Estate Program of the City Manager's Office shall:

1. Coordinate with Environmental Services EMP Coordinator for necessary Environmental Due-Diligence assessments when it is suspected that ASTs/USTs may be present on property transactions being considered by City of Tucson departments.
2. Report immediately any tanks acquired ancillary to the acquisition of real property to Fire Prevention, Environmental Services EMP Coordinator and FCM.



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Appendices None

References Spill Response Program (S-020C) of Central Safety Services.

Review Responsibility and Frequency The General Services Department Director shall initiate an annual multi-department review based on the date of publication. Last review date: March 5, 2009.

Authorized



City Manager



Date