

UNDERGROUND STORAGE TANK TRAINING



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SRRA IMPACT ON UST PROGRAM

- ESTABLISHED A LICENSED SITE REMEDIATION PROFESSIONAL (LSRP) WHO IS REQUIRED FOR REGULATED UST REMEDIATION:
 - REPLACES THE “SUBSURFACE EVALUATOR” FOR CLOSURE AND OTHER REMEDIATION FUNCTIONS FOR **REGULATED** UST SYSTEMS;
 - AN LSRP MUST BE RETAINED FOR CLOSURE OF A **REGULATED UST SYSTEM**;
 - SITE INVESTIGATIONS WHICH MAY BE REQUIRED FOR REGULATED UST SYSTEMS (I.E. IF PID READINGS **EXCEED 50 UNITS** IN SOIL OR GROUNDWATER DURING A SUSPECTED RELEASE) MUST BE PREPARED OR OVERSEEN BY AN LSRP;
 - AN LSRP MUST CERTIFY THAT THE NUMBER AND LOCATION OF VAPOR OR PRODUCT MONITORING POINTS IS SUFFICIENT TO MONITOR A REGULATED UST SYSTEM SHOULD THIS METHOD OF MONITORING BE CHOSEN TO COMPLY WITH THE RULES.
 - LSRP ISSUES RAO UPON COMPLETION OF REMEDIATION**

** LSRP HAS THE OBLIGATION AND RESPONSIBILITY TO MATCH ALL UST REGISTRATION DATA (SIZE, CONTENT, NUMBER OF TANKS...)



REGULATORY REQUIREMENTS FOR UST CLOSURE 7:14B-9.2

- THE OWNER OR OPERATOR WHO INTENDS TO CLOSE A REGULATED UST SHALL:
 - ENSURE THAT THE FACILITY AND UST IS REGISTERED WITH NJDEP;
 - AT LEAST 14 CALENDAR DAYS PRIOR TO CLOSURE, NOTIFY THE NJDEP AND COMPLETE APPROPRIATE FORM (ONLINE) –
 - *OWNER AND OPERATOR REQUIRED EMAIL NOTIFICATION 14 DAYS PRIOR TO ACTIVITY OF INSTALLATION, SUBSTANTIAL MODIFICATION OR CLOSURE (NJAC 7:14B-10A) – 14DAYUSTNOTICE@DEP.NJ.GOV*
 - **PROVIDE APPLICABLE MUNICIPAL AND COUNTY OFFICIALS WITH A COPY OF THE NJDEPS APPROVAL OF THE INTENT TO CLOSE THE UST;**
 - COMPLY WITH APPLICABLE REQUIREMENTS OF THE NJ UNIFORM CONSTRUCTION CODE.



REGULATORY REQUIREMENTS FOR UST CLOSURE

- THE OWNER OR OPERATOR WHO INTENDS TO CLOSE A REGULATED UST SHALL ALSO (NJAC 7:14B-9.2(D))
 - CLOSE AN UST PURSUANT TO THE AMERICAN PETROLEUM INSTITUTE RECOMMENDED PRACTICE 1604, "CLOSURE OF UNDERGROUND PETROLEUM STORAGE TANKS AND SHALL:
 - 1. **EXAMINE THE SECURED TANK FOR HOLES AND CALL THE DEPARTMENT HOTLINE AT 1-877-WARNDEP IF ANY HOLES ARE DISCOVERED AND/OR A DISCHARGE HAS BEEN CONFIRMED PURSUANT TO NJAC 7:14B-7.3, UNLESS THE DISCHARGE FROM THE TANK WAS PREVIOUSLY REPORTED TO THE DEPARTMENT; AND**
 - 2. REMOVE THE TANK FROM THE SITE ACCORDING TO ALL APPLICABLE LAWS AND REGULATIONS.



CONTAMINATION DETECTED DURING CLOSURE

- IF ANY CONTAMINATION IS DETECTED ABOVE ANY APPLICABLE REMEDIATION STANDARD, CONDUCT FURTHER REMEDIATION PURSUANT TO ARRCS (NJAC 7:26C) – LSRP REQUIRED



ROLE OF LICENSED SITE REMEDIATION PROFESSIONAL (LSRP)

- **RETENTION/DISMISSAL**
 - ONLINE FORM WITHIN 15 DAYS OF ACTION
- **CODE OF CONDUCT**
 - ALPHABET SOUP – 29 POINTS SRRA SECTION 16 (*WITHIN NJAC 7:261 NOW*)
 - A. HIGHEST PRIORITY: PROTECTION OF PUBLIC HEALTH, SAFETY AND THE ENVIRONMENT
 - C. SHALL NOT PROVIDE SERVICES OUT OF HIS/HER AREA OF EXPERTISE
 - F. TAKING OVER FROM ANOTHER LSRP AND ASSUMING RESPONSIBILITY
 - I. SHALL EXERCISE PROFESSIONAL JUDGEMENT
 - J. REPORT ALL IECS
 - K. REPORT ALL UNREPORTED DISCHARGES HE/SHE HAS KNOWLEDGE.*
 - Q. COOPERATE IN ANY BOARD INVESTIGATIONS
 - R. JOINT REASONABILITY OF LSRPS WORKING TOGETHER, EVEN IF NOT RETAINED.



LSRP VS SUBSURFACE EVALUATOR

- LSRP RULES DO NOT REQUIRE THEM TO WORK FOR CERTIFIED FIRM
- SUBSURFACE EVALUATOR (SSE) MUST WORK FOR CERTIFIED FIRM
- LSRP RULES DO NOT REQUIRE INSURANCE
- UST CERTIFICATION OF FIRMS REQUIRES CERTIFICATION WITH INSURANCE



LSRP VS SUBSURFACE EVALUATOR

- BOTH NEED TO SUBMIT UHOT CHECKLIST AND REPORT TO NJDEP WITH \$400 FOR RESIDENTIAL TANK CLOSURE NFA
- LSRP CAN WORK ON REGULATED TANKS; SSE CANNOT WITHOUT LSRP
- NEITHER CAN DO CLOSURE UNLESS CERTIFIED
- LSRP IS AUDITED BY BOARD AND MAY BE ISSUED VIOLATION BY THE BOARD. BOARD MAY TAKE ACTION AGAINST ANY *PERSON*



WHAT IF I AM NOT AN LSRP?

- CLOSURE, TANK TESTING, INSTALLATION, AND CORROSION PROTECTION CERTIFICATIONS FOR UST – STILL EXIST.
- SUBSURFACE EVALUATOR FOR HOTS SITES
- NON-LSRPS CAN WORK UNDER THE SUPERVISION OF LSRPS
- IF YOU HAVE A DEGREE IN A SCIENCE-RELATED FIELD AND 8 YEARS EXPERIENCE – STUDY FOR THE EXAM.



QUESTIONS?

ANSWERS?!?

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