Leaking Generator Day Tanks – Coming to a Facility Near You!

2018 National Tanks Conference

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Looks innocuous...



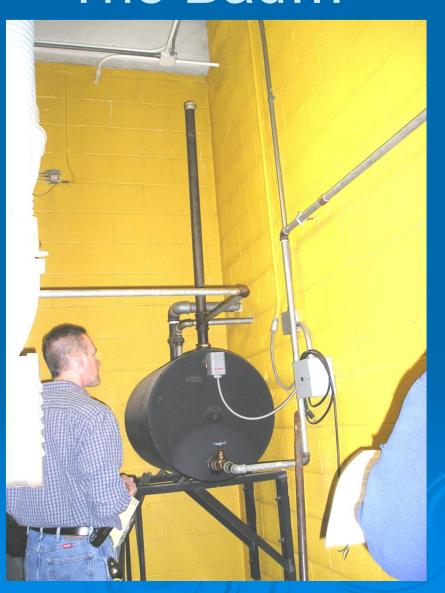
What is a "Day Tank"?

- A small tank typically located in or on a building and automatically supplied from a large UST
- The day tank allows for suction draw from an electrical generator and/or heating equipment
- Part of the UST system piping

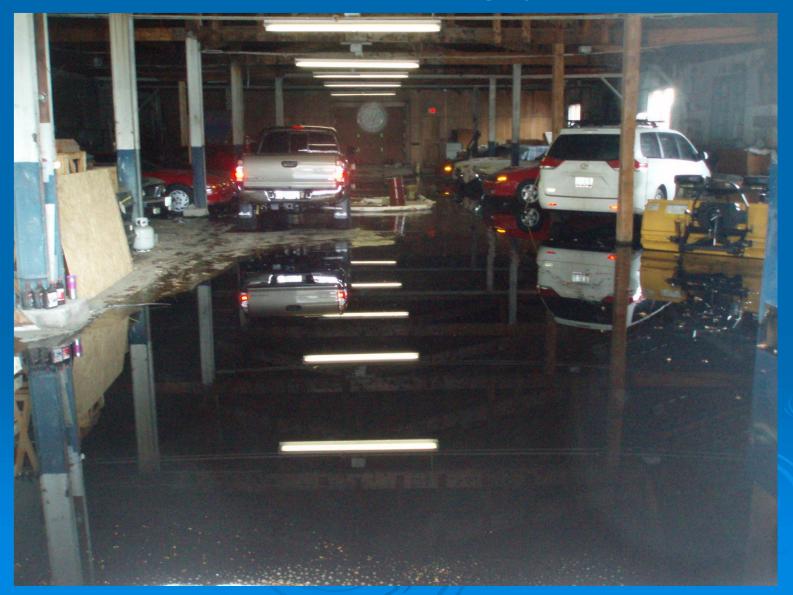
The Good...



The Bad...



and the Ugly



What is the Problem?





What Should We Do?

- ➤ NFPA 30 22.11 "Every tank.. shall be provided with means to prevent an accidental release of liquid from endangering important facilities.."
- Leakage from the tank shell
- Overfill
- Leakage from piping connected to the tank

NHDES Inspection Efforts

➤ In early days of the UST program day tanks were never inspected by NHDES

Started inspecting following nursing home incident of 2010

Newly inspect when conducting next periodic UST inspection

Common Compliance Issues

- No secondary containment or controls
- No overfill protection
- Not vented outside, or not vented!
- > Tank not listed for use
- Piping not listed for use

Compliance Obstacles

- "It was approved by the State years ago"
- "When did the rules change?"
- Contractor (or plumber) that installed it trying to avoid financial responsibility for improper installation
- Not knowing what the requirements are and why they are important

Solution?

Education and Outreach!

- Educate self and staff
- Educate chain of command
- Educate partners such as state and local fire officials
- Educate contractors, consultants, and engineers
- Educate facility owners and operators

Questions?

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