



**COLORADO**  
Department of  
Labor and Employment  
Division of Oil and Public Safety

# There's a hole in the bucket

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# National Trends – Last Decade

- Higher operational compliance
- Reduction in cleanup backlog
- Fewer new releases





# Spill Containment Testing

- Ever tested for functionality?
- Not designed to last forever.
- Associated release reported?





# Common Practice

Inspect

Repair or  
Replace

Test



# Correct Practice

Inspect

Test and  
Assess

Repair or  
Replace



# Suspected Release





# Confirming a Suspected Release

## 1. System Test

A tightness test

OR



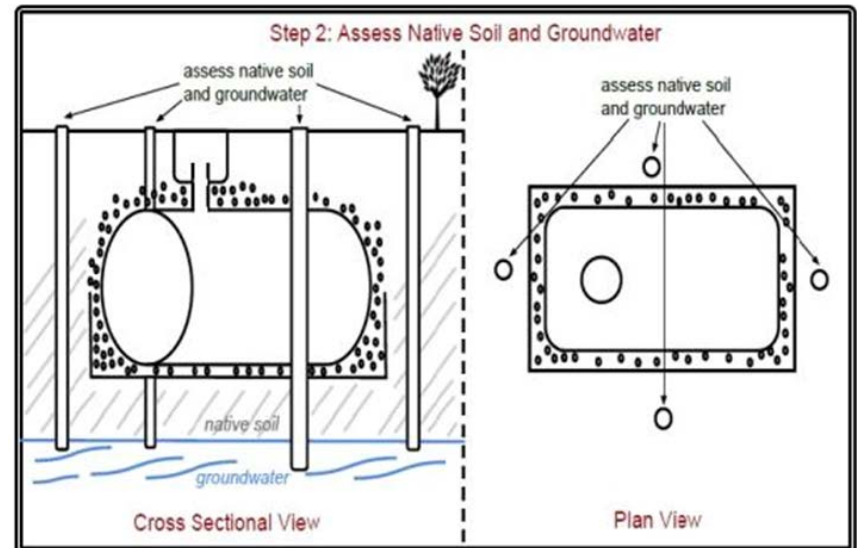
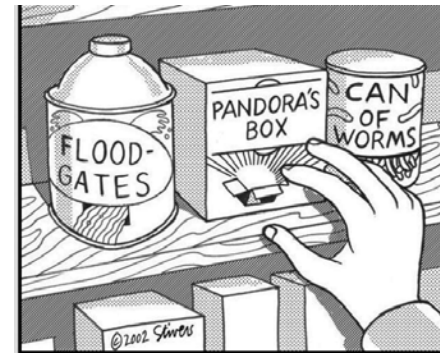
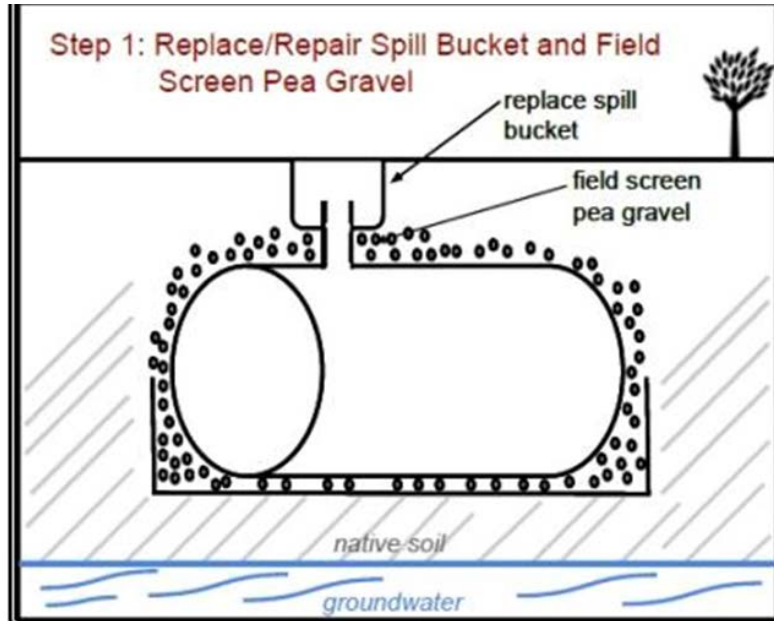
## 2. Site Check

Measure for the presence of a release where contamination is most likely to be present.





# Site Check







# Anticipated Impact

- High failure rates on spill containment testing
- Discover many new releases
- Require investigation and cleanup
- Impact petroleum storage tank fund (PSTF)
- Supply Demand Issues – equipment and contractors



# CROMPCO – Spill Buckets

- Pilot project in 1995
- Tested the integrity of spill buckets.
- Vacuum tested over 10,000 spill buckets
- Reported failure rates around 60%



# National Convenience Store

- Replaced spill buckets at 115 of their Colorado stores.
- Reported spill bucket failures and associated releases at 70% of their stores
- Sought reimbursement from PSTF for 30% percent of these releases.



# Lessons Learned

- 60 to 70 percent of the spill buckets will fail integrity testing and result in the discovery of releases that will need assessment and cleanup.
- Don't wait until deadline - Supply demand - costs will likely go up
- Provide incentive to motivate owners to test and upgrade early, and spread out impact to PSTF.



# Colorado Data Since 2017

- 150 spill buckets replaced/upgraded at 75 facilities
- 69% of these facilities had an associated release
- ~ 20 facilities have already received \$10,000 incentive for upgrading to double walled spill buckets
- 5 of these facilities have already received NFA
- Average spill bucket assessment/cleanup cost without significant contamination is around \$22,800

# Questions?

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