New Mexico Environment Department

Oversight of Installations, Modifications, and Repairs – Why is it Important?

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We are trying to protect this, right?

What has been installed?

Depending on when your state program started, it could be a good guess as to what is actually been installed at a UST facility.

Also, as gas stations are bought and sold over the years, the owner's original installation records may have been lost.

Tank Installation Oversight

UST was originally registered in 1990 as a fiberglass clad steel tank, but later, records were discovered that the tank was actually installed in 1967 and the facility had been sold three times before 1990. Current owner had no clue as to what type of tank was in the ground.

Tank Installation Oversight

Facility with four UST systems that were registered in 1993 as single walled fiberglass reinforced plastic tanks. Each tank had an Environ containment sump for the submersible turbine pump that was mounted on the STP riser. In 2004, the STP riser failed due to corrosion and when a contractor dug down to the top of the tank to replace the riser, it was discovered the UST was an internally lined steel tank. Three out of the four tanks failed internal lining inspections and were closed in place.

Tank Installation Oversight

Having state inspectors on-site during installations, modifications, and repairs can lead to getting more accurate understanding of what is actually installed at the facility. Observations can tell if the tank system is actually what is on the record.

Tank Installation Oversight

Was this piping installed in accordance with regulations or national code of practice?

The piping was installed in 1996 but without a state inspector present due to the owner not providing notification as required and using a contractor not certified in New Mexico.

Tank Installation Oversight

High throughput facility where the underground piping had been modified heavily over the years and at one point the super unleaded piping was replaced. The super unleaded fiberglass reinforced plastic piping was laid right on top of the diesel piping. After several years, the diesel pipe rubbed a hole in the bottom of the super unleaded piping causing a release to the environment.

Tank Installation Oversight

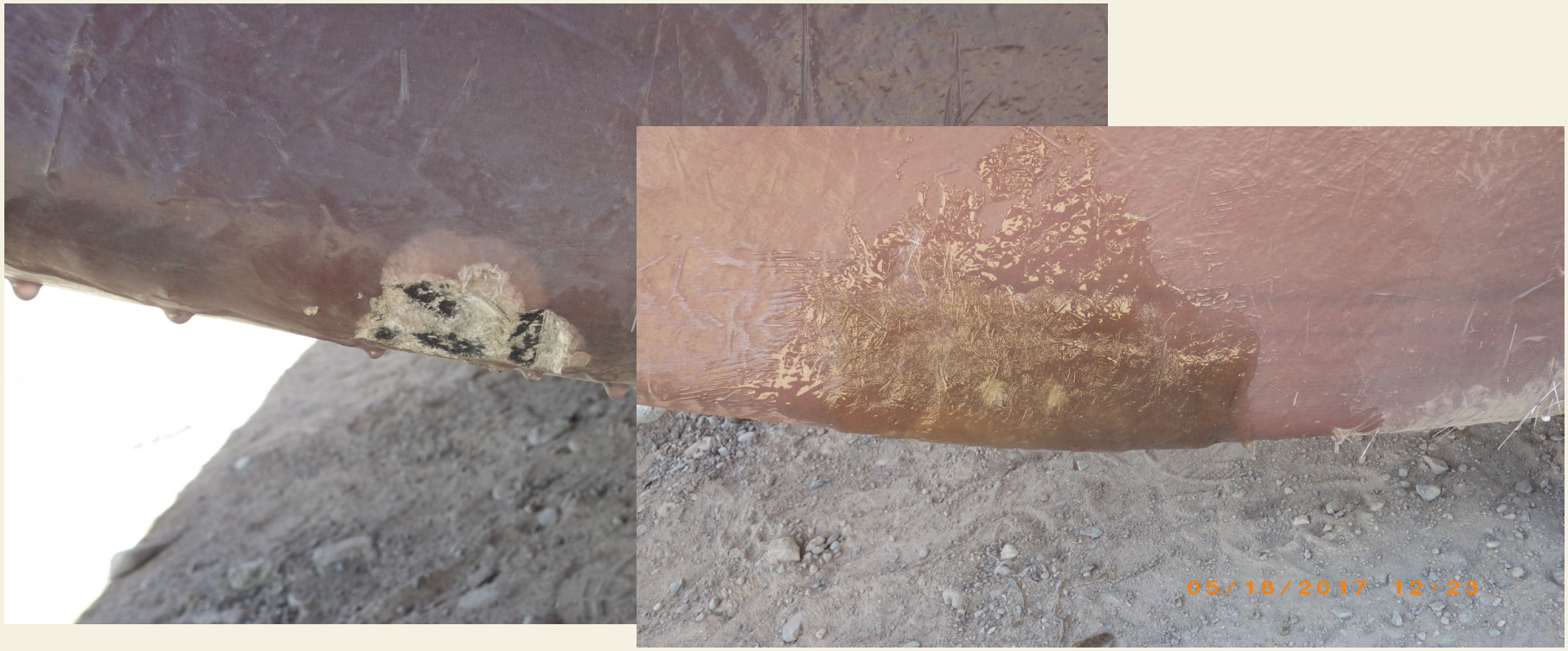
New secondary containment requirements means no issues with the installation of new USTs, right?

Tank Installation Oversight

New 12,000-gallon double walled ACT-100 UST arrived on-site in Las Cruces with a ¼ inch holiday in the FRP cladding in the lower quadrant of one end of the tank. Contractor asked if that should be repaired because the tank would probably not fail for at least 20 years.

Tank Installation Oversight

20,000-gallon double walled Permatank arrived at a site in Deming, New Mexico in 2017 with damage to the bottom of one end that compromised the integrity of the secondary of the tank. Owner asked if they could install the tank as a single walled tank and said, if a state inspector had not been there that it would have been installed without being repaired.



Tank Installation Oversight

A new 12,000-gallon dual compartment fiberglass reinforced plastic UST was hit by the crane operator as the tank was being unloaded and a first the contractor was stating the damage was insignificant. Tank was repaired after it failed to pass tightness tests.

Tank Installation Oversight

New double walled spill prevention equipment was replaced on regular unleaded UST in 2016 and it discovered during the initial hydrostatic test on the primary that water was leaking through both walls.

What could go wrong?

New triple compartment UST installed in 2020 by seasoned certified installer.

What could go wrong?

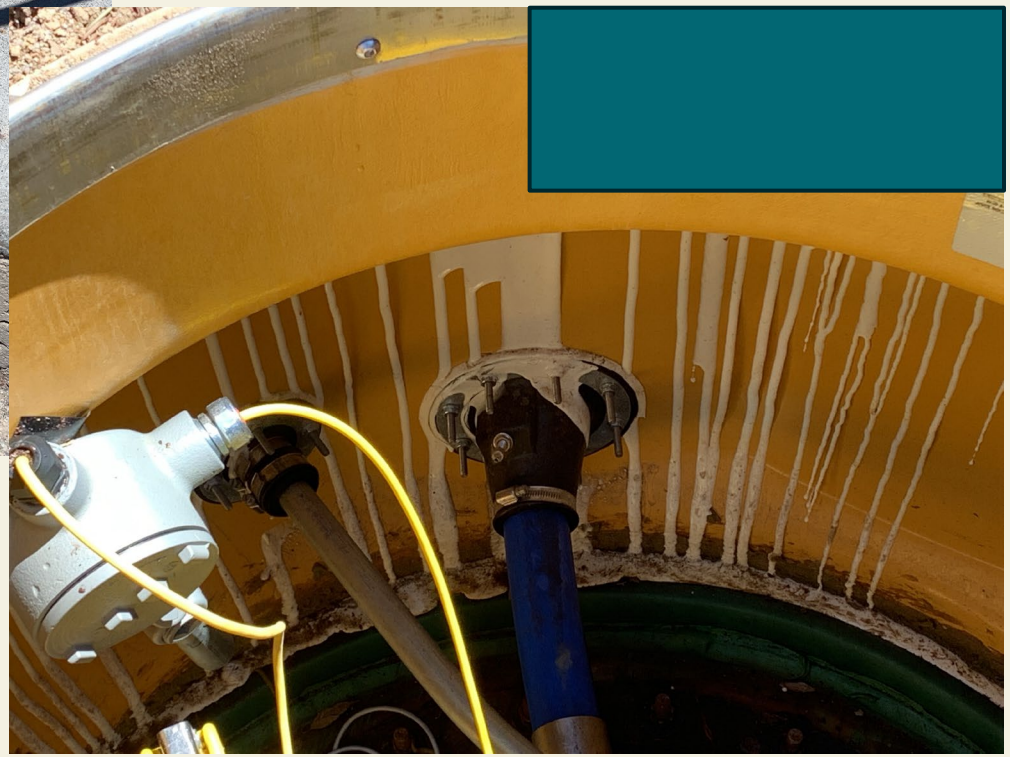
New Mexico PSTB Inspector was not on-site during the installation due to COVID-19 restrictions.

First compliance inspection after travel restrictions were lifted found the following:

1) Certified Installer retired one week after the installation started.
2) Company salesman with no field experience oversaw the completion of the installation

What could go wrong?

Concrete pad on top of UST was sinking on one corner.



STP Containment Sump not installed per manufacturer's installation instructions

What could go wrong?

- What is wrong in this picture?

Fill riser is too tall and with the tank in a traffic area it is a matter of time before tank is damaged.

What could go wrong?

- Double Walled Spill prevention had fuel and water in the interstice because float gauge was not tight.

What could go wrong?

Compatibility

During a recent installation of AO Smith fiberglass reinforced plastic piping on an UST to contain E85, the NM PSTB inspector noticed the contractor was using glue on the primary pipe that was not compatible with E85, and the contractor stated that was the only glue they had brought with them that day. The installation stopped until a compatible glue was acquired.

What does New Mexico do?

- Installers/contractors are certified by the Bureau.
  - Must pass International Code Council UST installer exam.
  - Must pass New Mexico Laws & Rules Test.
  - Must take and pass an on-site exam which the complete installation of a regulated UST system. If they get three strikes during the on-site exam they fail. Failure to test equipment is a common strike for applicants.

What does New Mexico do?

- Owners and installers must submit a 30-day Notification for installations, modifications, and repairs.
- The notification must include project drawings for installations.
- Scope of work and equipment list must be submitted as well.
- Regulations have a list of “Critical Junctures” during installations that require owners and installers to provide 24-hour verbal notification to NM PSTB Inspector.